Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068
www.minnesotaenergyresources.com

May 8, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

VIA ELECTRONIC FILING

RE: Minnesota Energy Resources Corporation's 2019 Annual Decoupling Evaluation Report

Docket No. G011/M-20-332

Dear Mr. Seuffert:

Minnesota Energy Resources Corporation ("MERC") submits this Annual Decoupling Evaluation Report for calendar year 2019, in accordance with the Minnesota Public Utilities Commission's ("Commission's") prior orders and MERC's approved tariffs on file with the Commission.

On July 13, 2012, the Commission issued its Findings of Fact, Conclusions, and Order in Docket No. G011/GR-10-977, authorizing MERC to implement a revenue decoupling pilot program for a period of three years, unless extended by Commission action. Order Point 11.A of the Commission's July 13, 2012, Order required that MERC file annual reports with the Commission that specify the Revenue Decoupling Mechanism ("RDM") adjustment to be applied to each rate class for the billing period and demonstrate annual progress toward achieving the 1.5 percent energy efficiency goal set forth in Minn. Stat. § 216B.241, along with an evaluation plan similar to the one used in CenterPoint Energy's decoupling pilot.

On October 31, 2016, the Commission issued its Findings of Fact, Conclusions, and Order in Docket No. G011/GR-15-736, authorizing MERC to continue its pilot RDM for an additional three years and requiring MERC to include additional information in its future annual decoupling evaluation reports. In particular, Order Point 15.c and d of the Commission's October 31, 2016, Order required:

> c. MERC shall address the merits of extending its revenue-decoupling mechanism to other customer classes as follows:
>
> i. In its annual decoupling filings, MERC shall include an analysis of the financial consequences for ratepayers and MERC of extending the decoupling program to all customer classes with more than 50 customers. MERC may also include an analysis of the financial consequences of extending its decoupling program to any other combination of customer classes.

d. MERC shall address the decline in energy conservation from the Residential class as follows:

i. In its annual decoupling filings, MERC shall include an analysis demonstrating the reasonableness of maintaining MERC's decoupling program given evidence that the level of savings generated by the Residential customer class has declined while the program has been in effect. MERC shall include (1) data showing its average Conservation Improvement Program (CIP) savings for the previous five years compared to the savings of its most recent complete year, and (2) an explanation for any differences in the CIP savings, including the likely impact of decoupling;

ii. In its decoupling evaluation report or in its initial filing of its next rate case, MERC shall include an analysis demonstrating the reasonableness of maintaining MERC's decoupling program given the evidence that the level of savings generated by the Residential customer class has declined while the program has been in effect.

On December 26, 2018, the Commission issued Findings of Fact, Conclusions, and Order in Docket No. G011/GR-17-563, approving modifications to MERC's decoupling effective January 1, 2019, including removal of MERC's General Service Small Commercial and Industrial ("C&I")customer class from decoupling, and authorizing an additional three-year extension of MERC's decoupling pilot.

MERC's last Decoupling Evaluation Report was submitted on May 1, 2019, covering the period January 1, 2018 to December 31, 2018, in Docket No. G011/M-19-201. On December 5, 2019, the Commission issued an order accepting MERC's 2018 Decoupling Evaluation Report; approving MERC's proposed revenue decoupling adjustment; requiring MERC to make a compliance filing describing the remaining reconciliation adjustment for the Small C&I class by January 15, 2020[1]; requiring MERC to work with the Minnesota Department of Commerce, Division of Energy Resources and other stakeholders, and to request the involvement of other utilities on the development of a more streamlined Annual Evaluation Report; and requiring MERC to make a compliance filing detailing proposed changes to the Annual Evaluation Report by July 31, 2020.

MERC submits this 2019 Decoupling Evaluation Report in compliance with the Commission's July 13, 2012; December 21, 2012; September 26, 2014; August 11, 2015; August 17, 2016; December 1, 2017; and February 6, 2019, Orders in Docket No. G011/GR-10-977; the Commission's October 31, 2016, Order in Docket No. G011/GR-15-736; and the Commission's December 5, 2019, Order in Docket No. G011/M-19-201.

Included with this filing are the following attachments:

[1] MERC submitted its Reconciliation Adjustment Compliance Filing on January 15, 2020, in Docket No. G011/M-19-201, describing the remaining reconciliation adjustment for the Small C&I class.

- **Attachment A:** A detailed incremental chronological listing and price per-therm impact of all rate adjustments during 2011 through 2019, consistent with Part G.6 of the Decoupling Evaluation Report.

- **Attachment B:** A detailed incremental chronological listing and impact of all commodity adjustments during 2011 through 2019, consistent with Part G.7 of the Decoupling Evaluation Report.

- **Attachment C:** MERC's 2012 Annual Gas Service Quality Report to serve as the "baseline" service quality level prior to implementation of the pilot program in accordance with Part I.2.e of the Decoupling Evaluation Report.

- **Attachment D:** Summary of the RDM adjustment to be applied to each rate class for the billing period along with supporting data for the calculations. In accordance with the Commission's April 17, 2016, Order and MERC's November 15, 2016, Compliance Filing, in Docket No. G011/GR-10-977, Attachment D includes both actual data for 2015 and 2016 based on MERC's billing data from its billing system, under the tables labeled "actual," and restated December 2015 and January 2016 data to restate customer counts for customers who were not billed in December 2015 but were billed twice in January 2016. The restated data is highlighted in yellow on the tabs labeled "2015 Restated" and "2016 Restated."

  Attachment D also provides the data responsive to the Commission's October 31, 2016, Order in Docket No. G011/GR-15-736, that MERC include an analysis of the financial consequences for ratepayers and MERC of extending the decoupling program to all customer classes with more than 50 customers and may also include an analysis of the financial consequences of extending its decoupling program to any other combination of customer classes. Attachment D includes an analysis of the financial consequences for ratepayers and MERC of extending decoupling to each customer class.

Please feel free to contact me at (414) 221-4208 if you have any questions regarding this report.

Sincerely,

Joylyn C. Hoffman Malueg

Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

Enclosures
cc: Service List

Minnesota Energy Resources Corporation's 2019 Annual Revenue Decoupling Evaluation Report

May 8, 2020

Minnesota Energy Resources Corporation 2019 Annual Revenue Decoupling Mechanism Evaluation Report

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A. Evaluation Overview and History of MERC's Decoupling Mechanism

A. Evaluation Overview and History of MERC's Decoupling Mechanism

This Annual Revenue Decoupling Evaluation Report covers the period of January 1, 2019, through December 31, 2019, the seventh year of Minnesota Energy Resources Corporation's ("MERC" or the "Company") decoupling pilot. This Evaluation Report is submitted in accordance with the Minnesota Public Utilities Commission's (the "Commission") prior orders related to MERC's evaluation of its decoupling program and the Company's approved revenue decoupling tariffs on file with the Commission.

In 2007, the Minnesota Legislature enacted Minn. Stat. § 216B.2412, which required the Commission to establish criteria and standards for decoupling of energy sales from revenues. Section 216B.2412 also authorized the Commission to approve one or more pilot programs to assess the merits of decoupling as a means of achieving energy savings. In 2009, the Minnesota Legislature amended Minn. Stat. § 216B.2412 to provide the Commission with additional procedural options to establish criteria and standards with respect to decoupling pilot programs.

On June 19, 2009, in Docket No. E,G999/CI-08-132, the Commission issued an Order Establishing Criteria and Standards to be Utilized in Pilot Proposals for Revenue Decoupling, concluding that "the most promising approach is to examine the pilot proposals that will be submitted based on the criteria and standards established by this Order. After implementation and review of these pilot projects, utilities will be in the position to tackle the details of implementing an effective decoupling program."

MERC first proposed a revenue decoupling pilot in its 2010 rate case in Docket No. G007,011/GR-10-977. The Commission approved a three-year revenue decoupling pilot effective January 1, 2013, and required the Company to submit annual evaluations in its July 13, 2012, Findings of Fact, Conclusions, and Order and December 21, 2012, Order in that docket.

MERC submitted its first decoupling evaluation report on March 27, 2014, for calendar year 2013. In its 2013 decoupling evaluation report, MERC provided both qualitative and quantitative information showing changes in the results of the Company's Conservation Improvement Program ("CIP"). As shown in that evaluation, MERC improved its energy savings for the Residential sector under decoupling in 2013.

On September 26, 2014, the Commission issued an Order accepting MERC's 2013 decoupling evaluation report, requiring MERC's next annual report to include an estimate of each class' revenues under (1) no decoupling, (2) partial decoupling, and (3) full decoupling, and approving the Company's proposal to file future annual decoupling reports by May 1, to coincide with the Company's annual CIP status report filing.

MERC submitted its second decoupling evaluation report on May 1, 2015, for calendar year 2014, inclusive of the additional reporting data required by the Commission's September 26, 2014, Order. MERC's 2014 decoupling evaluation report reflected that total energy savings had dropped significantly in 2014 in all sectors, although many of

the programs that were added as a result of decoupling continued to make inroads into their markets and produce savings. In its May 1, 2015, decoupling evaluation report, MERC requested that the Commission approve the Company's decoupling program on a permanent basis following completion of the pilot at the end of 2015. On August 11, 2015, the Commission issued an Order accepting MERC's 2014 decoupling evaluation report, extending MERC's decoupling pilot until such time as the Commission makes a decision as to its permanence, and instructing MERC to include pre-filed testimony in its next rate case discussing extending revenue decoupling to all of its customer classes.

In the Company's 2016 rate case filed on September 30, 2015, in Docket No. G011/GR-15-736, MERC submitted pre-filed testimony addressing the issue of extending revenue decoupling to additional customer classes.

On April 29, 2016, MERC submitted its third decoupling evaluation for calendar year 2015. As reflected in that evaluation report, in 2015, overall CIP savings exceeded previous annual savings recorded in the years 2010 to 2014, which include a pre-decoupling time period, as well as years when decoupling was in effect. On August 17, 2016, the Commission issued an Order accepting MERC's 2015 decoupling evaluation report, requiring MERC to include future reconciliation adjustment calculations in its decoupling annual report, and requiring MERC to file restated customer billing information.

On October 31, 2016, in MERC's 2016 rate case, Docket No. G011/GR-15-736, the Commission issued its Findings of Fact, Conclusions, and Order extending MERC's pilot revenue-decoupling program for an additional three years (2017-2019), without modification. In that Order, the Commission concluded that there was not a sufficient record to support requiring MERC to extend its decoupling to additional customer classes or requiring MERC to forego decoupling surcharges if the Company failed to achieve specified conservation goals. Additionally, the Commission required MERC to include additional information in its future annual decoupling evaluation reports. In particular, Order Point 15, parts c and d of the Commission's October 31, 2016, Order required the following:

> c. MERC shall address the merits of extending its revenue-decoupling mechanism to other customer classes as follows:
>
> i. In its annual decoupling filings, MERC shall include an analysis of the financial consequences for ratepayers and MERC of extending the decoupling program to all customer classes with more than 50 customers. MERC may also include an analysis of the financial consequences of extending its decoupling program to any other combination of customer classes.

d. MERC shall address the decline in energy conservation from the Residential class as follows:

i. In its annual decoupling filings, MERC shall include an analysis demonstrating the reasonableness of maintaining MERC's decoupling program given evidence that the level of savings generated by the Residential customer class has declined while the program has been in effect. MERC shall include (1) data showing its average Conservation Improvement Program (CIP) savings for the previous five years compared to the savings of its most recent complete year, and (2) an explanation for any differences in the CIP savings, including the likely impact of decoupling.

ii. In its decoupling evaluation report or in its initial filing of its next rate case, MERC shall include an analysis demonstrating the reasonableness of maintaining MERC's decoupling program given the evidence that the level of savings generated by the Residential customer class has declined while the program has been in effect.

On May 1, 2017, MERC submitted its fourth decoupling evaluation report for calendar year 2016, inclusive of the additional requirements set forth in the Commission's October 31, 2016, order. As reflected in that report, in 2016, savings were slightly down from the previous year and from the average of the pre-decoupling period. On December 1, 2017, the Commission issued an Order accepting MERC's 2016 revenue decoupling evaluation report and requiring MERC to include in its 2017 report an analysis of how extending the revenue decoupling mechanism ("RDM") to other customer classes would have impacted overall rates for the period 2013-2017.

On May 1, 2018, MERC filed its fifth decoupling evaluation report for calendar year 2017, including an analysis of how extending decoupling to other customer classes would have impacted customer rates during the period 2013-2017. In 2017, MERC only achieved 75.8 percent of its total energy savings goal despite extensive marketing. Residential savings were also down in 2017 due to the loss of almost 50 percent of savings resulting from the new building code.

On December 26, 2018, the Commission issued its Findings of Fact, Conclusions, and Order in MERC's 2018 rate case, Docket No. G011/GR-17-563, approving modifications to the Company's revenue decoupling program effective January 1, 2019, including removal of MERC's general service Small Commercial and Industrial ("C&I") customer

class from decoupling, and authorizing an additional three-year extension of MERC's decoupling pilot.

On February 6, 2019, the Commission issued an Order approving MERC's 2017 decoupling evaluation report and requiring the Company to file all future annual decoupling evaluation reports in separate dockets.

On May 1, 2019, MERC filed its sixth decoupling evaluation report for calendar year 2018 in Docket No. G011/M-19-201, including an analysis of how extending decoupling to other customer classes would have impacted customer rates during the period 2013-2018. In 2018, MERC achieved 96.7 percent of the 1 percent of CIP-applicable retail sales. The Commission issued an Order approving MERC's 2018 decoupling evaluation report on December 5, 2019, requiring the Company to (1) make a compliance filing describing the remaining reconciliation adjustment for the Small C&I class by January 15, 2020; (2) work with the Department and other stakeholders, and to request the involvement of other utilities, on the development of a more streamlined annual evaluation report; and (3) make a compliance filing detailing proposed changes to the annual evaluation report by July 31, 2020.

On January 15, 2020, in compliance with the Commission's December 5, 2019, Order, the Company filed its Reconciliation Adjustment Compliance Filing in Docket No. G011/M-19-201. In that filing, to close out the remaining over- or under-collection amounts for the Small C&I class for 2017 and 2018 (now Firm Class 1), MERC proposed (1) to calculate a 2017 Reconciliation Adjustment refund/surcharge to be effective on Small C&I bills from March 1, 2020, through February 28, 2021, for calendar year 2017; and (2) to calculate a 2018 Reconciliation Adjustment refund/surcharge to be effective on Small C&I bills from March 1, 2021, through February 28, 2022, for calendar year 2018. Following completion of the 2018 Reconciliation Adjustment, MERC proposed to track and defer any remaining over- or under-recovery amounts that result from the 2018 per-therm Reconciliation Adjustment applied to actual sales that are great than or less than forecasted sales to be addressed in MERC's next general rate case.

This decoupling evaluation report for 2019 reflects the seventh evaluation report filed by the Company. In 2019, MERC achieved 84.8 percent of energy savings goals. The Low-Income sector achieved 111.5 percent of energy savings goals; the Residential sector realized 86.1 percent of energy savings goals; and the C&I sector realized 82.7 percent of energy savings goals. MERC achieved 88.9 percent of the 1 percent of CIP-applicable retail sales.

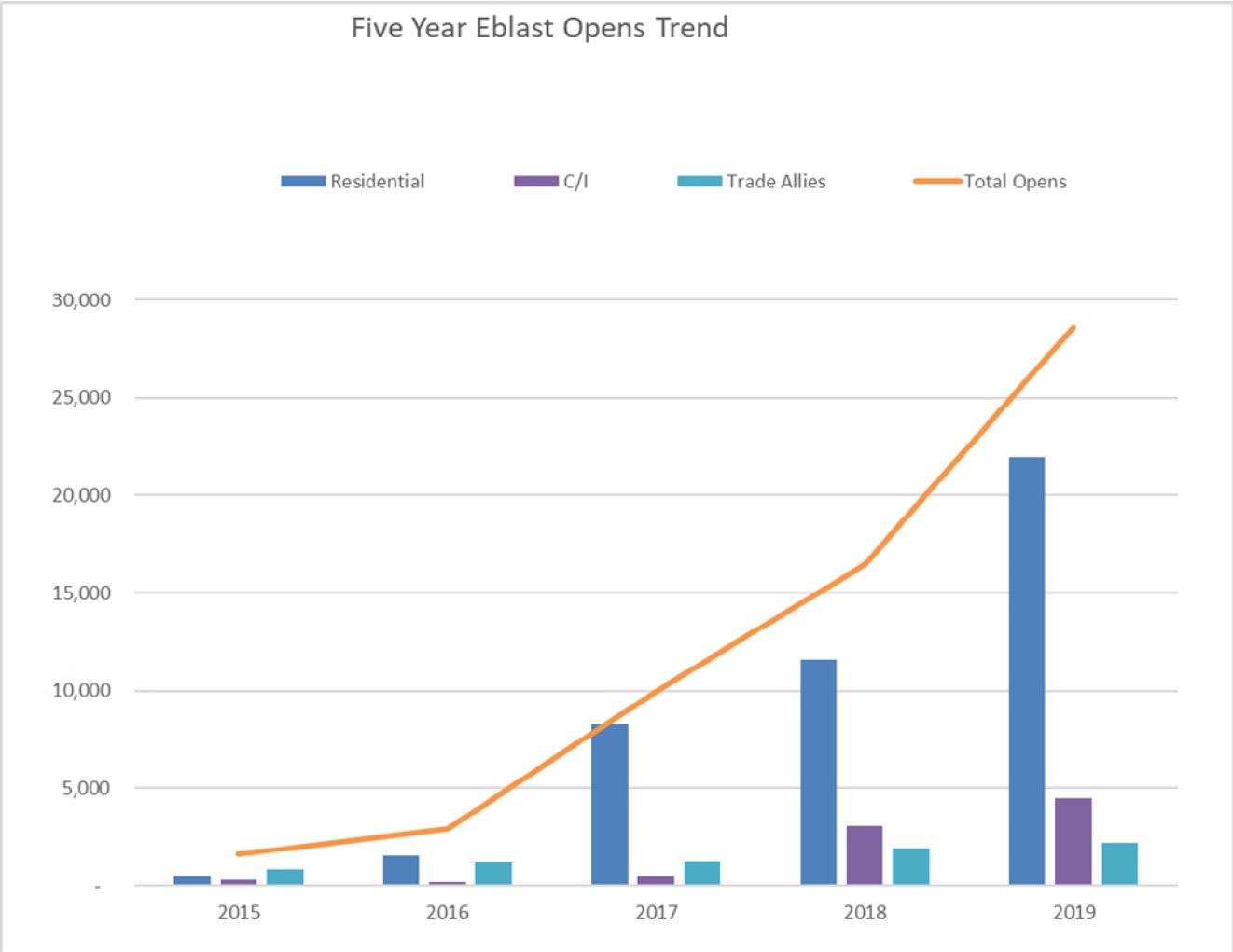
Over the past seven years, MERC's decoupling program has proven successful at effectively reducing some of the inherent disincentive to promote energy efficiency. The effectiveness of MERC's decoupling program in removing the disincentive to promote energy efficiency was particularly evident in 2019.

In preparing the 2017-2019 Triennial Plan, the Company reviewed historic trends and the impact of the various changes to the Technical Reference Manual and the new

energy code. It became evident at that time that meeting goals would be difficult for MERC. In preparation for this challenge, in 2017, MERC made several changes in its marketing efforts. After 2017 program year results were finalized, MERC recognized that in spite of increased marketing, the portfolio underperformed. In response, the Company filed modifications to the CIP plan in 2018 and 2019 to improve portfolio performance. These changes were presented in four formal modifications. The first modification, which was filed on May 17, 2018, and approved on July 13, 2018, expanded direct installation measures for commercial customers, provided for a waiver of customer co-pays for the 4U2 program to help remove barriers to participation, added insulated pipe wrap to MERC's water kit, updated water heater rebate measures, and added a home energy assessment. The second modification, which was filed on June 22, 2018, and approved by decision on September 27, 2018, added a residential behavioral change program and terminated MERC's Online Audit Tool. The third modification, which was filed on October 30, 2018, and approved by decision on December 28, 2018, reduced MERC's C&I Rebate program's budget and savings goals to offset the previously-approved residential behavioral change program. The fourth modification, which was filed on February 27, 2019, and approved by decision on April 29, 2019, added contractor incentives for C&I insulation projects and a modification to the retro-commissioning program in order to drive more activity to the C&I Rebate program

In 2018 and 2019, MERC continued to expand the communication of programs and benefits in bill inserts, articles in the newsletter, Customer Connection, and via direct mail campaigns. MERC added a customer relationship management tool to better coordinate C&I customer outreach.

From a digital perspective, in 2017, MERC planned and implemented a more targeted and strategic digital marketing approach to leverage the general awareness promotions mentioned above. Since then, the Company has continued this expanded outreach and increased the number of email campaigns related to CIP offerings from a total of 13 in 2015 and 21 in 2016, to 48 in 2017, 63 in 2018, and 82 in 2019. The number of emails sent in total increased from 4,161 in 2015 and 7,545 in 2016, to 27,575 in 2017, 46,507 in 2018, and 86,899 in 2019. The number of emails opened also increased significantly from 1,583 in 2015, to 2,895 in 2016, to 9,953 in 2017, 16,502 in 2018, and 28,589 in 2019.



For Residential and Small C&I customers, trade allies play a key role in influencing customer decisions to implement energy savings measures. When customers who participated in a residential rebate program were asked how they heard about the program, 75.7 percent responded the dealer/retailer. In 2019, the Company continued to aggressively conduct outreach to both trade allies and customers, increasing the number of targeted emails sent by 87 percent.

B. Evaluation of MERC's CIP Programs and Program Savings from 2010-2019

B. Evaluation of MERC's CIP Programs and Program Savings from 2010-2019

The following sections provide an evaluation of MERC's CIP program and program savings from 2010 through 2019. The evaluation uses the 2010 to 2012 CIP program activities for the baseline period prior to decoupling and the 2013 to 2019 CIP program activities for the post-decoupling implementation timeframe. The baseline for comparison is the average energy savings achieved for Residential and C&I customers for the period of 2010 to 2012.

Additionally, MERC is providing a separate breakout of savings for its Small C&I customers, consistent with its June 10, 2016, Reply Comments filed in Docket No. G011/GR-10-977. As stated in MERC's comments,

> Currently, the C&I sector is not broken out between small and large customer classes so MERC does not report separately on Small C&I CIP achievements. For purposes of the Decoupling Evaluation Report, MERC has calculated estimated CIP savings based on sales usage for Small C&I and Large C&I. MERC would be able to separately report Small C&I energy savings in its 2016 Decoupling Evaluation Report but would not be able to breakout historical data on CIP energy savings between the Small and Large C&I classes.

MERC has continued to separately calculate and report Small C&I energy savings in this 2019 report.

This section also addresses the Commission's Order Point in Docket No. G011/GR-15-736 requiring that MERC include an analysis demonstrating the reasonableness of maintaining the Company's decoupling program given evidence that the level of savings generated by the Residential customer class has declined while the program has been in effect. Consistent with the Commission's Order, MERC is required to include (1) data showing its average CIP savings for the previous five years compared to the savings of its most recent complete year, and (2) an explanation for any differences in the CIP savings, including the likely impact of decoupling.

Several items should be noted with respect to this evaluation:

- Savings were reported in MCFs for the 2010-2012 Triennial Plan period ("Base Years"). Starting with the 2013-2015 Plan period ("Post Years"), savings are reported in dekatherms ("Dth"). For simplicity, these units are referenced in this evaluation interchangeably; savings have not been recalculated based on British Thermal Unit ("BTU") content or any other calculation.

- In the Base Years, CIP portfolios, budget, and savings goals for Peoples Natural Gas ("PNG") and Northern Minnesota Utilities ("NMU") were separate. Starting with the Post Years, they were combined. This evaluation report reflects achievements

for PNG and NMU both separately and combined for ease of comparison, as the Post Years no longer track them separately.

- In the Base Years, low-income programs were considered part of Residential programs. However, because the Low-Income sector has been separated out for the Post Years, it has been separated out for the Base Years as well.

- Low-income programs in the Base Years consisted only of the Low Income Weatherization program. Starting with the Post Years, Low-Income sector programs included both Low Income Weatherization and the 4U2 programs. For ease of comparison, 4U2 has been incorporated into the Low-Income sector for the Base Years. It should also be noted that in the 2010 program year, the 4U2 program was a pilot and only offered through four Community Action Program ("CAP") agencies in the PNG service territory.

- To minimize the impact of portfolio-level costs from changes in programs, these costs have been reported separately. These costs include actual spending for CIP support (marketing, fulfillment, data entry into the tracking system, planning, legal, preparing filings and reports, Minnesota Department of Commerce, Division of Energy Resources ("Department") assessments, etc.).

- At the time of writing this report, numbers for 2019 CIP activities have not been filed and consequently, all 2019 numbers reported herein are preliminary.

- While the decoupling mechanism was approved in 2012 and implemented effective January 1, 2013, the initial activity surrounding increasing CIP commitments as a result of decoupling started in 2012 with one-on-one meetings with a variety of stakeholders to obtain input on program ideas. These stakeholders included the Department, the Isaak Walton League of America, the Minnesota Center for Environmental Advocacy, and the Clean Energy Resource Teams ("CERTs"). Based on these meetings, MERC made the following modifications in 2013 to implement new measures and programs:

    - A residential heating system tune-up measure was implemented.

    - A retro-commissioning measure was included as part of the C&I Custom Rebate.

    - A Multifamily Direct Install Plus program was launched in July 2013.

    - A Small Business Direct Install Plus program was launched in August 2013.

- CIP activity changes from year to year, especially for small utilities with large customers. For instance, the C&I sector for NMU achieved 132.7 percent of the sector energy savings goal in 2011 and 232.8 percent of the sector energy savings goal in 2012. For PNG, however, the C&I sector achieved approximately 70 percent of the sector energy savings goal in both 2011 and 2012, while the Residential

sector achieved 106.2 percent of the energy savings goal in 2011 and 89.1 percent in 2012. Due to the customer class makeup of NMU, the C&I sector normally carried the energy savings, while for PNG, the opposite was true—the Residential sector normally carried the bulk of the savings. To smooth out the impacts that can be made by large projects, the analysis has included an average over the three Base Years.

- One of the major changes to the Post Years from the Base Years is the discontinuance of behavior-based programs in the Post Years, though, as noted above, MERC reintroduced the behavior-based program in late 2018. While the Base Years C&I behavioral program was very small and therefore did not have a large impact, the Base Year version of the Residential behavior-based program was large and recognized full program savings, and had a more significant impact on portfolio results. Effective with the 2013 program year, the Department implemented significant modifications to how savings were calculated for behavioral programs, reducing the energy savings by two-thirds. As a result, in order to provide a more accurate comparison of the Base Years to the Post Years, when relevant, MERC has provided two charts—one including the residential behavior program savings and one modifying the residential behavior program savings in accordance with the Average Savings Method. While the behavioral program, Home Energy Reports, was reintroduced in December 2018, because 2019 is a ramp-up year, this program did not have a dramatic impact on 2019 results.

- CIP savings goals decreased significantly in 2013-2014 due to several factors including an increase in large customers who opted out, a decrease in the operations and maintenance ("O&M") savings allowed for the Building Operator Certification program, an increasing saturation of the potential market for the large customer Turnkey Efficiency program, and reductions in savings in 2014 due to an anticipated increase in the baseline for high-efficiency furnaces, which reduced savings even though participation and measures remained the same.

- In 2015, MERC's CIP savings goals were increased as a result of the acquisition of Interstate Power & Light's ("IPL") Minnesota gas service territory and due to a correction to the CIP-exempt sales.

- The following table summarizes MERC's energy savings goals during the Base Years and Post Years through 2019:

	Energy Saving Goals		Percent of Retail Sales	
	PNG	NMU	PNG	NMU
2010	324,510	89,326	0.79%	0.68%
2011	392,079	105,188	0.93%	0.79%
2012	450,423	121,682	1.07%	0.90%
2013	394,948		1.12%	
2014	357,561		1.01%	
2015	453,193		1.05%	
2016	460,537		1.07%	
2017	531,810		1.01%	
2018	541,514		1.03%	
2019	552,566		1.05%	

A number of key challenges and successes are worth noting with respect to MERC's energy savings achievements following implementation of decoupling:

- The residential heating system tune-up measure, introduced in the 2013-2015 Triennial Plan filing, was projected to achieve 1.8 Dth of savings per unit. In the 2013-2015 Triennial Plan, MERC estimated 2,000 participants for 2013, 4,000 for 2014, and 6,000 for 2015. This would provide 3,200 Dth of savings in 2013, 6,400 Dth in 2014, and 9,600 Dth in 2015. Unfortunately, participation levels for this measure continued to fall short, and measure projections were dialed back in the 2017-2019 Triennial Plan period. In addition, MERC implemented an Authorized Insulation Contractor ("AIC") program starting in September 2013. This program was implemented to eliminate, to the extent possible, fraudulent activities in air sealing and insulation activities by a variety of organizations that use strong arm tactics in door-to-door marketing. Only work performed by AICs would be eligible for a rebate. While MERC expected a lower number of rebate applications for this measure due to the change, the actual participation continues to be lower than projected. As a result, savings did not meet the lowered goal. However, the 2013-2015 plan assumed an increase in the furnace baseline, starting in 2014, which did not materialize. Consequently, unexpected savings were recognized due to the lower efficiency baseline, helping to offset lower savings from tune-ups and insulation. These impacts continued through 2019.

- The retro-commissioning measure has not been a high-demand measure. Therefore, MERC estimated two participants in 2013, increasing to six in 2014, and eight in 2015. Savings were estimated at 4,000 Dth per participant. In the first three post-decoupling implementation years, there were no requests for retro-commissioning, even though the Turnkey implementation contractor provided information on the availability of this measure to all C&I customers with whom they were in contact. In each of 2016, 2018, and 2019, one rebate application was approved.

- In 2013, MERC issued a Request for Proposals ("RFP") for an implementation contractor for the Multifamily and Small Business programs. The vendor was selected in the summer of 2013 and the programs were implemented in late summer. The Company was extremely pleased that the Multifamily program exceeded its energy savings goal in 2013, even though the program was in start-up mode. It continues to exceed its energy savings goal. The Multifamily program has evolved to serve as an opportunity to partner with multiple electric utilities in the delivery of services. In 2018, the program also captured the spotlight with a feature news article published in The Multi Housing Advocate, CIC Midwest News Quarterly, and the Department CIP News. The Multifamily program continues to exceed program goals.

- The Small Business program achieved approximately 30 percent of its energy savings goal in 2013, but achieved approximately 88 percent in 2014, a significant increase. It achieved 80.1 percent of its energy savings goal in 2015. Despite the increased participation in eligibility usage from 500 Dth per year to 2,000 Dth per year, the implementation contractor continued to struggle with obtaining participation. MERC worked with the implementation contractor to implement special marketing campaigns targeting this "hard-to-reach" customer segment. It was deemed most likely that market potential would be depleted for the next Triennial Plan period. In the 2017–2019 Triennial Plan, MERC received approval to discontinue the program. However, small business customers continue to be eligible for other C&I programs. In 2018, a modification was made to support C&I partnerships for site visits and direct installation of energy efficiency measures. In late 2018, MERC forged partnerships with Minnesota Power and, in 2019, with Xcel Energy to jointly provide community blitz assessments with direct installation of measures to small businesses. Although this produces minimal savings upfront, the intent is that these assessments will help drive future rebate activity.

- Other minor changes were approved for the 2017–2019 Triennial Plan. These changes include higher rebates for advanced (auto-programming) thermostats, a quality installation pilot for furnaces, and a builder rebate structure based on percentage achieved over energy code for residential new construction.

MERC continues to be committed to the success of the CIP program.

B.1. Based on the results reported in the annual CIP Status Reports, by what amounts did the Company change its CIP program expenditures and its resulting natural gas MCF savings through Company-sponsored programs over the term of the RDM, relative to the 2010-2012 pre-decoupling period? What were the annual CIP savings (completed project basis) for 2019, for Residential and Commercial & Industrial compared to achieved MCF savings in the 2010-2012 (completed project basis) pre-decoupling period?

Changes to CIP expenditures are detailed in Tables B1(A) and B1(B) below. Table B1(A) provides the information based on all programs, including the residential behavior program. Table B1(B) eliminates the residential behavior program. With the reintroduction of the behavioral program, these charts will reflect activity in the Post Years. Both charts also compare 2018 to 2019, 2019 to the average of the Base Years, and the average of the Base Years to the average of the Post Years.

Table B1 (A) - CIP Expenditures

All Programs	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Programs-PNG	$595,445	$467,377	$564,803	$542,542								
Low Income Programs-NMU	$173,617	$105,824	$193,307	$157,583								
Low Income Programs-Total	**$769,062**	**$573,201**	**$758,110**	**$700,124**	**$1,044,422**	**$950,752**	**$1,036,515**	**$1,119,228**	**$1,596,460**	**$1,535,530**	**$1,936,532**	**$1,317,063**
Residential Programs-PNG	$2,874,197	$3,558,117	$4,021,906	$3,484,740								
Residential Programs-NMU	$449,292	$459,060	$471,925	$460,092								
Residential Programs-Total	**$3,323,489**	**$4,017,176**	**$4,493,831**	**$3,944,832**	**$4,259,150**	**$3,215,396**	**$3,623,799**	**$4,421,040**	**$4,765,649**	**$5,102,923**	**$ 5,556,795**	**$4,420,679**
C&I Programs-PNG	$2,082,270	$1,694,020	$1,871,669	$1,882,653								
C&I Programs-NMU	$514,180	$925,118	$1,543,768	$994,355								
C&I Programs-Total	**$2,596,450**	**$2,619,138**	**$3,415,437**	**$2,877,008**	**$2,230,960**	**$2,089,208**	**$2,812,099**	**$2,280,494**	**$2,987,644**	**$3,587,350**	**$ 3,228,689**	**$2,745,206**
Portfolio Level Expenses-PNG	$652,607	$651,263	$975,455	$759,775								
Portfolio Level Expenses-NMU	$207,651	$206,396	$308,184	$240,744								
Portfolio Level Expenses-Total	**$860,258**	**$857,659**	**$1,283,639**	**$1,000,519**	**$1,095,706**	**$1,105,476**	**$1,398,226**	**$1,377,966**	**$1,317,245**	**$1,551,632**	**$ 1,393,444**	**$1,319,956**
Total Expenditures-PNG	$6,204,519	$6,370,776	$7,433,833	$6,669,709								
Total Expenditures-NMU	$1,344,740	$1,696,397	$2,517,185	$1,852,774								
Total Expenditures-Total	**$7,549,259**	**$8,067,174**	**$9,951,017**	**$8,522,483**	**$8,630,240**	**$7,360,832**	**$8,870,639**	**$9,198,728**	**$10,666,998**	**$11,777,435**	**$12,115,461**	**$9,802,905**
Change 2018 to 2019:				**$338,025**	**2.8%**							
Change Base Years Average to 2019:				**$3,592,977**	**42.2%**							
Change Base Years Average to Post Years Average:				**$1,280,421**	**15.0%**							

Table B1 (B) - CIP Expenditures

Programs Without Residential Behavior Program	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Programs-PNG	$595,445	$467,377	$564,803	$542,542								
Low Income Programs-NMU	$173,617	$105,824	$193,307	$157,583								
Low Income Programs-Total	**$769,062**	**$573,201**	**$758,110**	**$700,124**	**$1,044,422**	**$950,752**	**$1,036,515**	**$1,119,228**	**$1,596,460**	**$1,535,530**	**$1,936,532**	**$1,317,063**
Residential Programs-PNG	$2,445,335	$3,120,519	$3,466,413	$3,010,756								
Residential Programs-NMU	$326,918	$348,137	$314,502	$329,852								
Residential Programs-Total	**$2,772,253**	**$3,468,656**	**$3,780,916**	**$3,340,608**	**$4,259,150**	**$3,215,396**	**$3,623,799**	**$4,421,040**	**$4,765,649**	**$4,903,647**	**$ 5,155,713**	**$4,334,913**
C&I Programs-PNG	$2,082,270	$1,694,020	$1,871,669	$1,882,653								
C&I Programs-NMU	$514,180	$925,118	$1,543,768	$994,355								
C&I Programs-Total	**$2,596,450**	**$2,619,138**	**$3,415,437**	**$2,877,008**	**$2,230,960**	**$2,089,208**	**$2,812,099**	**$2,280,494**	**$2,987,644**	**$3,587,350**	**$3,228,689**	**$2,745,206**
Portfolio Level Expenses-PNG	$652,607	$651,263	$975,455	$759,775								
Portfolio Level Expenses-NMU	$207,651	$206,396	$308,184	$240,744								
Portfolio Level Expenses-Total	**$860,258**	**$857,659**	**$1,283,639**	**$1,000,519**	**$1,095,706**	**$1,105,476**	**$1,398,226**	**$1,377,966**	**$1,317,245**	**$1,551,632**	**$1,393,444**	**$1,319,956**
Total Expenditures-PNG	$5,775,657	$5,933,179	$6,878,340	$6,195,725								
Total Expenditures-NMU	$1,222,366	$1,585,475	$2,359,762	$1,722,534								
Total Expenditures-Total	**$6,998,023**	**$7,518,654**	**$9,238,102**	**$7,918,260**	**$8,630,240**	**$7,360,832**	**$8,870,639**	**$9,198,728**	**$10,666,998**	**$11,578,159**	**$11,714,378**	**$9,717,139**
Change 2018 to 2019:				**$136,219**	**1.2%**							
Change Base Years Average to 2019:				**$3,796,119**	**47.9%**							
Change Base Years Average to Post Years Average:				**$1,798,880**	**22.7%**							

Activity for Low Income Weatherization had been declining in the early Post Years. This program has since rebounded. The 4U2 program has overcome marketing obstacles and continues to have a pipeline of customers. However, because 4U2 is unable to leverage Federal Weatherization Assistance Program funding, the total cost of improvements is borne by MERC, thereby increasing the cost per Dth saved. In addition, Federal Weatherization Assistance Program protocols have increased the health and safety issues that must be addressed in each home, increasing program costs without any additional savings. Furthermore, due to MERC's dispersed service territory, it has been difficult to find qualified insulation contractors who are readily available to work on the Company's projects in outstate Minnesota. Finally, in recent years, for homes with vermiculite in the attic, delays can occur in potential work being completed. Low-Income sector spending increased significantly from 2018 to 2019, and, in 2019, was over 250% higher when compared to the Base Years.

Residential sector spending increased from 2018 to 2019, from Base Years to 2019, and from Base Years to the Post Years. The continued health of the new construction market and the reconfiguration and focused outreach related to water kits contributed to this achievement in 2019.

C&I sector expenditures decreased from 2018 to 2019, and from Base Years to Post Years; however, expenditures increased from Base Years to 2019.

Overall, expenditures increased across the entire portfolio in all aspects, as observed in table B1(A), comparing 2018 to 2019, 2019 to Base Years, and Post Years to Base Years. Spending increased 2.8 percent from 2018 to 2019, 42.2 percent from Base Years to 2019, and 15 percent from Base Years to Post Years.

Changes to CIP savings are detailed in Tables B1(C) and B1(D) below. Table B1(C) provides the information based on all programs, including the residential behavior program with full behavioral savings claimed in Base Years. Table B1(D) modifies savings for the residential behavior program for the Base Years by acknowledging only 33 percent of the savings, consistent with the approved average savings method. Both charts also compare 2018 to 2019, the average of the Base Years to 2019, and the average of the Base Years to the average of the Post Years.

Table B1 (C) - CIP Savings All Programs

All Programs	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Programs-PNG	8,337	6,009	5,710	6,685								
Low Income Programs-NMU	2,231	1,235	1,954	1,806								
Low Income Programs-Total	**10,567**	**7,244**	**7,664**	**8,492**	**11,207**	**8,139**	**8,114**	**8,387**	**12,256**	**9,592**	**12,996**	**10,099**
Residential Programs-PNG	194,455	205,978	200,156	200,196								
Residential Programs-NMU	37,754	34,504	31,933	34,731								
Residential Programs-Total	**232,209**	**240,482**	**232,090**	**234,927**	**208,071**	**180,137**	**209,604**	**211,918**	**158,514**	**181,707**	**232,188**	**197,448**
C&I Programs-Small C&I	n/a *	n/a *	n/a *	n/a *	n/a *	n/a *	n/a *	**13,523**	**5,874**	**4,725**	**6,294**	**7,604**
C&I Programs-PNG	146,083	144,398	153,171	147,884								
C&I Programs-NMU	56,977	65,624	141,671	88,091								
C&I Programs-Total	**203,060**	**210,022**	**294,842**	**235,975**	**205,542**	**180,792**	**275,664**	**238,173**	**226,344**	**317,388**	**246,721**	**241,518**
Total Savings-PNG	348,874	356,384	359,038	354,765								
Total Savings-NMU	96,962	101,363	175,558	124,628								
Total Savings	**445,836**	**457,748**	**534,596**	**479,393**	**424,821**	**369,068**	**493,382**	**472,000**	**402,989**	**513,412**	**498,199**	**453,410**
Change 2018 to 2019:				**(15,213)**	**-3.0%**							
Change Base Years Average to 2019:				**18,806**	**7.1%**							
Change Base Years Average to Post Years Average:				**(25,983)**	**-5.4%**							

* Savings for qualifying C/I Small Business Programs available from 2016 forward.

Table B1 (D) - CIP Savings with Average Savings Method applied to Behavioral Program

All Programs	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Programs-PNG	8,337	6,009	5,710	6,685								
Low Income Programs-NMU	2,231	1,235	1,954	1,806								
Low Income Programs-Total	**10,567**	**7,244**	**7,664**	**8,492**	**11,207**	**8,139**	**8,114**	**8,387**	**12,256**	**9,592**	**12,996**	**10,099**
Residential Programs-PNG	153,452	176,987	163,200	164,546								
Residential Programs-NMU	26,137	26,584	22,748	25,157								
Residential Programs-Total	**179,590**	**203,571**	**185,948**	**189,703**	**208,071**	**180,137**	**209,604**	**211,918**	**158,514**	**178,053**	**202,533**	**192,690**
C&I Programs-Small C&I	n/a *	n/a *	n/a *	n/a *	n/a *	n/a *	n/a *	**13,523**	**5,874**	**4,725**	**6,294**	**7,604**
C&I Programs-PNG	146,083	144,398	153,171	147,884								
C&I Programs-NMU	56,977	65,624	141,671	88,091								
C&I Programs-Total	**203,060**	**210,022**	**294,842**	**235,975**	**205,542**	**180,792**	**275,664**	**238,173**	**226,344**	**317,388**	**246,721**	**241,518**
Total Savings-PNG	307,872	327,393	322,081	319,115								
Total Savings-NMU	85,345	93,443	166,373	115,054								
Total Savings	**393,217**	**420,837**	**488,454**	**434,169**	**424,821**	**369,068**	**493,382**	**472,000**	**402,989**	**509,758**	**468,544**	**448,652**
Change 2018 to 2019:				**(41,214)**	**-8.1%**							
Change Base Years Average to 2019:				**34,375**	**17.4%**							
Change Base Years Average to Post Years Average:				**14,483**	**3.3%**							

* Savings for qualifying C/I Small Business Programs available from 2016 forward.

Total savings in the Low-Income sector increased in 2019 compared to 2018.

The Residential sector increased energy savings in 2019 compared to 2018 under both scenarios. Savings were higher in 2019 compared to Base Years when reviewing the impact of the average savings method, as shown in Table B1(D). Post Years, however, were lower overall relative to the average of Base Years based on actual savings, as shown in Table B1(C). The decrease in savings in the current planning cycle relates to the fact that the new energy code reduced the savings from an average of 48.2 Dth per participant in 2016 down to 31.5 Dth per participant in 2019. This translates to a 35 percent reduction in savings.

Savings in the C&I sector decreased in 2019 as compared to 2018. This was primarily the result of a very large custom rebate project that occurred in 2018. Customer projects of this size are rarely seen in MERC's territory.

Overall, as shown in Table B1(C) the result over the entire portfolio is a decrease in observed savings of 3 percent from 2018 to 2019; an increase of 7.1 percent from the average of the Base Years to 2019; and a decrease of 5.4 percent from the average of Base Years to the average of the Post Years based on actual savings. After adjusting behavior program savings in accordance with the average savings method, as reflected in Table B1(D), there is a decrease in claimable savings of 8.1 percent from 2018 to 2019, an increase of 17.4 percent in observed savings from the average of the Base Years to 2019, and an increase of 3.3 percent from the average of the Base Years to the average of the Post Years.

Based on this comparison, results through and including 2019 indicate that when Base Year behavioral program savings are adjusted to account for the Average Savings Method, MERC has achieved increased average energy savings in the Post Years after implementation of decoupling.

As previously agreed, MERC compared the list of Small C&I customers covered by the RDM to all C&I activity in the CIP program and identified savings from the Small C&I customer class.[1] This savings has been listed separately in the charts. MERC and its implementation contractor found through direct experience that Small C&I customers covered by the RDM are truly "hard to reach." They are busy, seldom have sufficient staff to be concerned about energy efficiency, and energy costs do not comprise a significant part of their overall operating expenses. In addition, many rent their facility

[1] As explained in previous annual decoupling evaluation reports, MERC was unable to breakout historical data on CIP energy savings between the Small and Large C&I classes for comparison to the 2016 and 2017 results. This is consistent with MERC's Reply Comments for its 2015 Annual Decoupling Evaluation Report:

> Currently, the C&I sector is not broken out between small and large customers classes so MERC does not report separately on Small C&I CIP achievements. For purposes of the Decoupling Evaluation Report, MERC has calculated estimated CIP savings based on sales usage for Small C&I and Large C&I. MERC would be able to separately report Small C&I energy savings in its 2016 Decoupling Evaluation Report but would not be able to breakout historical data on CIP energy savings between the Small and Large C&I classes.

In the Matter of the Application by Minn. Energy Res. Corp. for Auth. to Increase Rates for Nat. Gas Serv. in Minn., Docket No. G011/GR-10-977, MERC REPLY COMMENTS, 2015 ANNUAL DECOUPLING EVALUATION (June 10, 2016).

from a landlord and so are unable or unwilling to make building investments to increase energy efficiency. Despite these obstacles, in 2019, 6,294 Dth of savings resulted from their participation in MERC's CIP programs, up from 4,725 reported in 2018. In 2019, MERC underwent a rate restructuring which does not perfectly align with prior methods of identifying small business participation. Going forward, MERC will proceed with consistently mapping to the new rate definitions.

B.2. What is the proportion of MCF savings from Company-sponsored CIP programs compared to overall weather normalized sales volumes, in total, and for Residential and Commercial & Industrial customers for each year 2010 through 2019?

The savings numbers for the Base Years are from the combination of PNG and NMU CIP Status Reports. The sales numbers have been taken from the combination of PNG and NMU Jurisdictional Reports with numbers adjusted to remove the sales of customers who were approved to opt-out of the CIP program and program charges.

Changes to CIP savings as a percentage of sales (from the respective planning cycles) are detailed in Table B2 below. A second table modifying the impact of the residential behavior program was not included as the difference did not significantly change the final result. Table B2 shows CIP savings results in energy saved as a percentage of sales in Post Years.

The sales included in Table B2 are the three-year average of weather normalized sales from each respective planning period.

Table B2 - CIP Savings as Percent of Weather-Normalized Sales (Dth)

All Programs	First Year Energy Savings	Applicable 3-Yr Average, 20-Yr Weather Normalized Sales (Dth)	Energy Savings as Percent of Retail Sales
Base Year - 2010 (2010-2012 Triennial)	445,836	54,862,275	0.81%
Base Year - 2011 (2010-2012 Triennial)	457,748	54,862,275	0.83%
Base Year - 2012 (2010-2012 Triennial)	534,596	54,862,275	0.97%
Post Year - 2013 (2013-2015 Triennial)	424,821	35,297,938	1.20%
Post Year - 2014 (2013-2015 Triennial)	369,068	35,297,938	1.05%
Post Year - 2015 (Ext of 2013-2015	493,382	43,175,948	1.14%
Post Year - 2016 (Ext of 2013-2015	472,000	43,175,948	1.09%
Post Year - 2017 (2017-2019 Triennial)	402,989	52,732,921	0.76%
Post Year - 2018 (2017-2019 Triennial)	509,758	52,732,921	0.97%
Post Year - 2019 (2017-2019 Triennial)	468,544	52,732,921	0.89%

B.3. What were the associated lost margins from Company-sponsored CIP, Residential and Commercial & Industrial customers for each year 2010 through 2019?

Lost margins for all programs are provided in Table B3(A). These lost margins correspond to the savings detailed in Table B1(D).

Table B3 (A) - CIP Savings: Margin Revenues

All Programs	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Low Income-PNG	$14,795	$11,668	$11,087							
Low Income-NMU	$4,854	$2,987	$4,727							
Low Income Programs-Total	**$19,649**	**$14,655**	**$15,814**	**$22,138**	**$18,142**	**$17,693**	**$20,112**	**$29,557**	**$24,932**	**$33,034**
Residential-PNG	$345,080	$399,947	$388,643							
Residential-NMU	$82,149	$83,462	$77,243							
Residential Programs-Total	**$427,229**	**$483,409**	**$465,886**	**$411,023**	**$401,525**	**$457,062**	**$508,179**	**$382,272**	**$462,821**	**$514,819**
SC&I Programs-PNG	$21,725	$21,907	$21,073							
LC&I Programs-PNG	$197,221	$214,889	$230,105							
SC&I Programs-NMU	$10,471	$12,500	$24,471							
LC&I Programs-NMU	$100,927	$130,189	$283,720							
SC&I Programs-Total	**$32,196**	**$34,407**	**$45,544**	**$42,798**	**$46,230**	**$61,085**	**$26,949**	**$12,961**	**$11,250**	**$14,149**
LC&I Programs-Total	**$298,148**	**$345,078**	**$513,825**	**$307,738**	**$302,025**	**$401,120**	**$434,229**	**$382,183**	**$577,469**	**$434,525**
Total Lost Margins-PNG	$578,821	$648,411	$650,908							
Total Lost Margins-NMU	$198,401	$229,138	$390,161							
Total Lost Margins	**$777,222**	**$877,549**	**$1,041,069**	**$783,698**	**$767,922**	**$936,962**	**$989,470**	**$806,974**	**$1,076,473**	**$996,528**

B.4. During the 2010-2012 pre-decoupling time period as compared to the post-decoupling implementation time period of 2013-2019, did the Company change the scope or magnitude of any of its natural gas CIP programs?

MERC has made a number of modifications to its natural gas CIP programs in the Post Years, as discussed earlier in this report. In 2018, the Company filed modifications to the CIP plan to improve portfolio performance with respect to goal achievement. These changes were presented in three formal modifications. The first modification, which was filed on May 17, 2018, and approved on July 13, 2018, expanded direct installation measures for commercial customers, provided for a waiver of 4U2 customer co-pays, added insulated pipe wrap to MERC's water kit, updated water heater rebate measures, and added a home energy assessment. The second modification, which was filed on June 22, 2018, and approved by decision on September 27, 2018, added a residential behavioral change program and terminated MERC's Online Audit Tool. The third modification, which was filed on October 30, 2018, and approved by decision on December 28, 2018, reduced MERC's C&I Rebate program's budget and savings goals to offset the previously-approved residential behavioral change program. In 2019, MERC filed a fourth modification, on February 27, 2019, which was approved by decision on April 29, 2019, adding contractor incentives for C&I insulation projects and a modification to the retro-commissioning program in order to drive more activity to the C&I Rebate program.

B.5. What incremental program changes or expansions were implemented, and when, for the pre-decoupling time period of 2010-2012 as compared to the post-decoupling implementation time period of 2013-2019? Identify and describe each new, revised, or expanded programmatic change for Residential and Commercial & Industrial customers.

Behavior programs were discontinued after the Base Years, although MERC reinitiated a behavioral program offering in 2018. The Base Years included the Residential Home Energy Reports by Opower and the Schools for Energy Efficiency program by Hallberg Engineering.

The Company made the following changes to the CIP programs for the Post Years. The changes were made to improve the overall efficiency of the programs.

- The Residential Online Energy Audit was added as part of the Residential sector support programs in 2013. The Online Energy Audit provided a tool to generate leads for other programs; however, the tool was discontinued at the end of 2018.

- Direct installation of low-cost measures was added to In-Home Energy Audits. MERC's residential auditors now install up to two low-flow showerheads, up to two bathroom faucet aerators, a low-flow kitchen faucet aerator, and up to six feet of pipe insulation as appropriate for the home. The 2015-2016 CIP Plan Extension added an additional direct installation measure. A 2017 modification added two additional direct installation options.

- In 2013, Residential dishwasher rebates were added for gas water heating customers. Dishwashers must be ENERGY STAR® certified to qualify for a rebate.

- The Residential AIC program was introduced in September 2013. This program provides for quality insulation and air sealing work by a cadre of insulation contractors who have: 1) agreed to program rules for customer service and marketing tactics; 2) passed Residential Building Envelope Whole House Air Leakage Control Installer BPI Certification; 3) taken combustion air training through the Center for Energy and Environment; and 4) passed a stringent quality control process on their initial insulation jobs. Random quality control inspections continue. Only insulation jobs performed by an AIC contractor were eligible for a rebate. This requirement has drastically reduced the number of insulation rebates issued in the last quarter of 2013 and in 2014 through 2019. This reduction is expected to continue.

The following measures and programs were added as a direct result of input from stakeholder discussions as required by the decoupling mechanism approval:

- A Residential Heating System Tune-Up Rebate was added. This rebate provided $35 for a 7-point heating system tune-up.

- Retro-commissioning was added as a measure under C&I Custom Rebates. This program was further modified in 2019 to encourage greater participation.

- A Small Business program was added. This program targeted the hard-to-reach small commercial customer who used approximately 500 Dth per year or less. In 2015, this usage was increased to 2,000 Dth per year or less. This program provided for direct installation of low-cost measures such as faucet aerators and pre-rinse spray valves as appropriate. It installed and programmed, or reprogrammed, setback thermostats to fit the businesses' needs. The program also provided a basic analysis of their energy use and investigated up to three additional high-value energy savings opportunities. Finally, the program offered assistance for completing these high-value savings opportunities. It should be noted that this program was discontinued at the end of 2016.

- A Multifamily program was added. This program targeted multifamily buildings with five or more units with a central gas meter, central heating, and central or individual water heating systems. It included low-income housing, 55-and-over senior housing, assisted living, on-campus college housing, and apartments. The program provided for direct installation of low-flow showerheads and faucet aerators, heating system and other high-value energy savings opportunity analysis, programming or re-programming of existing boiler controls, and customer ventilation analysis and improvement as appropriate. In addition, low-income multifamily buildings were eligible for an additional 25 percent on many of the standard C&I rebates.

  In 2016, a Quality Installation pilot for 95 percent and 97 percent Annual Fuel Utilization Efficiency ("AFUE") gas furnaces was initiated. The results of this small pilot were analyzed in 2018. Pre- and post-usage for participants was compare to pre- and post-usage for a control group. The statistical analysis was not able to validate Iowa program studies.

  In 2017, the Company filed a modification to add direct install measures for residential audit programs, add two C&I prescriptive measures, and incorporate various existing measure adjustments.

- In 2018, the Company filed modifications to the CIP plan to improve portfolio performance. The first modification allowed for expanding partnerships in the Residential sector support programs and delivering additional direct install measures in the commercial sector support programs. In addition, this modification included a request for addition pipe wrap to the Water Kit program to extract more savings. The second modification proposed the discontinuance of the Online Audit Tool in order to reintroduce a residential behavioral program, Home Energy Reports. The Online Audit Tool was an indirect program with no savings goals, whereas the Home Energy Reports program will generate savings. The third modification reduced MERC's C&I

Rebate program's budget and savings goals to offset the previously-approved residential behavioral change program.

- In 2019, MERC filed a fourth modification, adding contractor incentives for C&I insulation projects and a modification to the retro-commissioning program in order to drive more activity to the C&I Rebate program.

B.6. What new or revised customer educational, informational, and marketing programs related to CIP were implemented by the Company during 2019? What were the primary messages and estimated costs of each of these programs? Were any MCF savings attributed to such programs in the annual CIP Status Report, and if so, how much, and using what assumptions or studies?

As mentioned above, Residential Online Energy Audit tool was added during 2013 and continued through 2018 to help identify residential opportunities. This tool was discontinued at the end of 2018 and replaced with a behavioral program. The primary driver for deploying the Online Energy Audit tool was to encourage greater energy efficiency program participation.

MERC invested in updating C&I customer North American Industry Classification System ("NAICS") codes in 2013 to enable C&I customer market segmentation and meaningful direct mail campaigns. The effort cost-effectively identified NAICS codes for 85 percent of the C&I customers. This effort was handled internally and was absorbed into the marketing budget. MERC continues to use NAICS codes for the direct marketing of specific measures and messages to targeted customer segments.

Trade ally email blasts ("e-blasts") were also implemented during 2013 and continued through 2019. Using information from past rebate application forms, MERC targeted specific trade ally groups with information pertinent to their customer base. The costs incurred were primarily labor costs to gather email addresses, develop content, and send the emails.

Residential customer email outreach was also implemented in 2013 and continued through 2019. To facilitate the ability of customers to unsubscribe from and track the effectiveness of the email outreach, MERC subscribes to Constant Contact, a software tool that tracks the number of opened emails, click-throughs, and unsubscribe requests. The cost of this service is minimal (less than $500 per year). Other costs associated with this outreach effort included labor to develop the template, write the emails, and send them to customers.

Starting in 2018 and continuing through 2019, MERC has engaged in the co-delivery of energy efficiency assessments with Minnesota Power. This community blitz outreach delivers both direct installation of energy efficiency measures, and also provides energy efficiency education. Also, with the addition of the behavioral program in late 2018,

nearly 75,000 residential customers received Home Energy Reports delivered to their home which provide energy efficiency tips.

More detailed information on the increased promotional activity and outreach is provided in Section B.13 below.

B.7. What were the annual revenues collected in base rates from ratepayers to fund CIP programs by Residential and Commercial & Industrial customers for the pre-decoupling period of 2010-2012 as compared to the post-decoupling implementation period of 2013 through 2019?

Table B7 below reflects annual revenues collected in base rates from MERC's Residential and Small C&I customers.

Table B7 - Annual Revenues Collected in Base Rates

All Programs	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Residential - PNG	$831,723	$876,866	$709,447							
Residential - NMU	$278,770	$304,250	$262,806	$2,692,461	$4,865,135	$3,943,080	$4,345,378	$4,770,331	$6,101,875	$5,879,133
C&I - PNG	$41,544	$43,879	$32,540							
C&I - NMU	$20,941	$19,376	$16,891	$181,945	$362,793	$258,141	$186,572	$223,462	$290,368	$289,860
Total	**$1,172,978**	**$1,244,371**	**$1,021,684**	**$2,874,406**	**$5,227,928**	**$4,201,221**	**$4,531,950**	**$4,993,793**	**$6,392,243**	**$6,168,993**

B.8. What were actual annual CIP expenditures for 2010-2012? How were such amounts spent each year for Residential and Commercial & Industrial customers? Identify the total expenditures directly distributed to customers (by customer group), and the total expenditures for the administration and program delivery of the programs.

The actual annual CIP expenditures by sector are listed below, categorized by incentive and non-incentive expenditures. Incentive expenditures are rebates only and do not consider costs for materials that are directly installed. Non-incentive expenditures are for administration, fulfillment and other delivery costs, marketing, and evaluation.

Actual CIP expenditures, exclusive of non-program portfolio costs related to CIP support and marketing, are detailed by type in Tables B8(A) and B8(B) below. Table B8(A) provides totals for all programs, including the residential behavior program. Table B8(B) excludes the costs of the residential behavior program.

Table B8 (A) - Actual Expenditures by Type

All Programs	2010			2011			2012		
	Incentive	Non-Incentive	Total	Incentive	Non-Incentive	Total	Incentive	Non-Incentive	Total
Low Income Sector-PNG	$0	$595,445	$595,445	$0	$467,378	$467,378	$0	$564,803	$564,803
Low Income Sector-NMU	$0	$173,617	$173,617	$0	$105,824	$105,824	$0	$193,307	$193,307
Low Income Sector-Total	**$0**	**$769,062**	**$769,062**	**$0**	**$573,202**	**$573,202**	**$0**	**$758,110**	**$758,110**
Residential Sector-PNG	$1,649,675	$1,224,522	$2,874,197	$2,141,314	$1,416,802	$3,558,116	$2,488,687	$1,533,219	$4,021,906
Residential Sector-NMU	$207,119	$242,173	$449,292	$233,131	$225,929	$459,060	$213,440	$258,485	$471,925
Residential Sector-Total	**$1,856,794**	**$1,466,695**	**$3,323,489**	**$2,374,444**	**$1,642,731**	**$4,017,176**	**$2,702,127**	**$1,791,704**	**$4,493,831**
C&I Sector-PNG	$1,240,023	$842,247	$2,082,270	$561,367	$1,132,653	$1,694,020	$988,327	$883,342	$1,871,669
C&I Sector-NMU	$269,442	$244,738	$514,180	$516,849	$408,269	$925,118	$1,016,674	$527,094	$1,543,768
C&I Sector-Total	**$1,509,465**	**$1,086,985**	**$2,596,450**	**$1,078,216**	**$1,540,921**	**$2,619,138**	**$2,005,001**	**$1,410,436**	**$3,415,437**
Total-PNG	$2,889,698	$2,662,214	$5,551,912	$2,702,681	$3,016,833	$5,719,514	$3,477,014	$2,981,364	$6,458,378
Total-NMU	$476,561	$660,528	$1,137,089	$749,980	$740,021	$1,490,001	$1,230,114	$978,886	$2,209,000
Total	**$3,366,259**	**$3,322,742**	**$6,689,001**	**$3,452,661**	**$3,756,854**	**$7,209,515**	**$4,707,128**	**$3,960,250**	**$8,667,378**
Incentive vs non-incentive as a percent of total spending	**50.3%**	**49.7%**		**47.9%**	**52.1%**		**54.3%**	**45.7%**	

	2013			2014			2015		
	Incentive	Non-Incentive	Total	Incentive	Non-Incentive	Total	Incentive	Non-Incentive	Total
Low Income Sector	$0	$1,044,422	$1,044,422	$0	$950,752	$950,752	$0	$1,067,508	$1,067,508
Residential Sector	$2,993,564	$1,265,586	$4,259,150	$1,946,935	$1,268,462	$3,215,397	$2,296,764	$1,644,408	$3,941,172
C&I Sector	$1,196,127	$1,034,833	$2,230,960	$982,346	$1,106,862	$2,089,208	$1,566,309	$2,040,842	$3,607,150
Total	**$4,189,691**	**$3,344,842**	**$7,534,533**	**$2,929,281**	**$3,326,076**	**$6,255,357**	**$3,863,073**	**$4,752,758**	**$8,615,830**
Incentive vs non-incentive as a percent of total spending	**55.6%**	**44.4%**		**46.8%**	**53.2%**		**44.8%**	**55.2%**	

	2016			2017			2018		
	Incentive	Non-Incentive	Total	Incentive	Non-Incentive	Total	Incentive	Non-Incentive	Total
Low Income Sector	$0	$1,119,228	$1,119,228	$0	$1,596,460	$1,596,460	$0	$1,535,530	$1,535,530
Residential Sector	$2,486,416	$1,934,625	$4,421,040	$2,607,574	$2,158,075	$4,765,649	$2,709,384	$2,393,539	$5,102,923
C&I Sector	$1,139,652	$1,140,842	$2,280,494	$1,799,115	$1,188,529	$2,987,644	$2,610,504	$976,846	$3,587,350
Total	**$3,626,067**	**$4,194,694**	**$7,820,762**	**$4,406,689**	**$4,943,065**	**$9,349,754**	**$5,319,888**	**$4,905,915**	**$10,225,803**
Incentive vs non-incentive as a percent of total spending	**46.4%**	**53.6%**		**47.1%**	**52.9%**		**52.0%**	**48.0%**	

	2019		
	Incentive	Non-Incentive	Total
Low Income Sector	$0	$1,936,532	$1,936,532
Residential Sector	$2,946,840	$2,609,956	$5,556,795
C&I Sector	$1,955,304	$1,273,386	$3,228,689
Total	**$4,902,144**	**$5,819,873**	**$10,722,017**
Incentive vs non-incentive as a percent of total spending	**45.7%**	**54.3%**	

Table B8 (B) - Actual Expenditures by Type

Programs Without Residential Behavior	2010			2011			2012		
Program	Incentive	Non-Incentive	Total	Incentive	Non-Incentive	Total	Incentive	Non-Incentive	Total
Low Income Sector-PNG	$0	$595,445	$595,445	$0	$467,378	$467,378	$0	$564,803	$564,803
Low Income Sector-NMU	$0	$173,617	$173,617	$0	$105,824	$105,824	$0	$193,307	$193,307
Low Income Sector-Total	**$0**	**$769,062**	**$769,062**	**$0**	**$573,202**	**$573,202**	**$0**	**$758,110**	**$758,110**
Residential Sector-PNG	$1,649,675	$795,660	$2,445,335	$2,141,314	$979,205	$3,558,116	$2,488,687	$977,726	$4,021,906
Residential Sector-NMU	$207,119	$119,799	$326,918	$233,131	$115,006	$459,060	$213,440	$101,062	$471,925
Residential Sector-Total	**$1,856,794**	**$915,459**	**$2,772,253**	**$2,374,444**	**$1,094,212**	**$4,017,176**	**$2,702,127**	**$1,078,788**	**$4,493,831**
C&I Sector-PNG	$1,240,023	$842,247	$2,082,270	$561,367	$1,132,653	$1,694,020	$988,327	$883,342	$1,871,669
C&I Sector-NMU	$269,442	$244,738	$514,180	$516,849	$408,269	$925,118	$1,016,674	$527,094	$1,543,768
C&I Sector-Total	**$1,509,465**	**$1,086,985**	**$2,596,450**	**$1,078,216**	**$1,540,921**	**$2,619,138**	**$2,005,001**	**$1,410,436**	**$3,415,437**
Total-PNG	$2,889,698	$2,233,352	$5,123,050	$2,702,681	$2,579,236	$5,719,514	$3,477,014	$2,425,871	$6,458,378
Total-NMU	$476,561	$538,154	$1,014,715	$749,980	$629,099	$1,490,001	$1,230,114	$821,463	$2,209,000
Total	**$3,366,259**	**$2,771,506**	**$6,137,765**	**$3,452,661**	**$3,208,335**	**$7,209,515**	**$4,707,128**	**$3,247,334**	**$8,667,378**
Incentive vs non-incentive as a percent of total spending	**54.8%**	**45.2%**		**47.9%**	**44.5%**		**54.3%**	**37.5%**	
	2013			**2014**			**2015**		
	Incentive	**Non-Incentive**	**Total**	**Incentive**	**Non-Incentive**	**Total**	**Incentive**	**Non-Incentive**	**Total**
Low Income Sector	$0	$1,044,422	$1,044,422	$0	$950,752	$950,752	$0	$1,067,508	$1,067,508
Residential Sector	$2,993,564	$1,265,586	$4,259,150	$1,946,935	$1,268,462	$3,215,397	$2,296,764	$1,644,408	$3,941,172
C&I Sector	$1,196,127	$1,034,833	$2,230,960	$982,346	$1,106,862	$2,089,208	$1,566,309	$2,040,842	$3,607,150
Total	**$4,189,691**	**$3,344,842**	**$7,534,533**	**$2,929,281**	**$3,326,076**	**$6,255,357**	**$3,863,073**	**$4,752,758**	**$8,615,830**
Incentive vs non-incentive as a percent of total spending	**55.6%**	**44.4%**		**46.8%**	**53.2%**		**44.8%**	**55.2%**	
	2016			**2017**			**2018**		
	Incentive	**Non-Incentive**	**Total**	**Incentive**	**Non-Incentive**	**Total**	**Incentive**	**Non-Incentive**	**Total**
Low Income Sector	$0	$1,119,228	$1,119,228	$0	$1,596,460	$1,596,460	$0	$1,535,530	$1,535,530
Residential Sector	$2,486,416	$1,934,625	$4,421,040	$2,607,574	$2,158,075	$4,765,649	$2,709,384	$2,194,263	$5,102,923
C&I Sector	$1,139,652	$1,140,842	$2,280,494	$1,799,115	$1,188,529	$2,987,644	$2,610,504	$976,846	$3,587,350
Total	**$3,626,067**	**$4,194,694**	**$7,820,762**	**$4,406,689**	**$4,943,065**	**$9,349,754**	**$5,319,888**	**$4,706,639**	**$10,026,527**
Incentive vs non-incentive as a percent of total spending	**46.4%**	**53.6%**		**47.1%**	**52.9%**		**53.1%**	**46.9%**	

	2019		
	Incentive	**Non-Incentive**	**Total**
Low Income Sector	$0	$1,936,532	$1,936,532
Residential Sector	$2,946,840	$2,208,873	$5,155,713
C&I Sector	$1,955,304	$1,273,386	$3,228,689
Total	**$4,902,144**	**$5,418,791**	**$10,320,934**
Incentive vs non-incentive as a percent of total spending	**47.5%**	**52.5%**	

B.9. How did MERC's natural gas Commissioner-approved conservation energy savings goal(s) compare to the reported CIP energy savings for each year 2010 through 2019 reported in the annual CIP Status Report? How did decoupling influence these results?

Actual versus approved energy savings are detailed in Tables B9(A) and B9(B) below. Table B9(A) provides the information based on all programs, including the residential behavior program. Table B9(B) shows the effect of modifying the residential behavior program savings by the Average Savings Method. The percent of approved energy savings achieved decreased in 2019 compared to 2018.

Residential savings increased in 2019 compared to 2018 results. The adoption of new water heating standards and ENERGY STAR® water heaters in 2019 resulted in a decline in participation within the measure category. The overall conversion to the uniform energy factor ("UEF") factor has also led to lower category measure savings. With the new triennial, the impacts of the new energy code caused a decrease in calculated energy savings. In 2018, MERC reintroduced the behavioral program, added

pipe wrap to water kits, and aggressively marketed residential rebates to boost savings. MERC also engaged in community partnerships to increase Water Kit program results. This increased outreach in both water kit and Residential rebate measures improved the sector savings results by 7.6 percent when compared to 2018.

In the C&I segment, MERC proposed, and the Department approved, a modification to reduce the C&I Rebate program goals in 2018 in order to realign savings goals with expected market conditions. Although the C&I sector fell short of goal in 2019, MERC recognized improvement, when compared to 2017, the first year of the triennial plan cycle. In addition, over 1,000 outbound customer calls were made and trade ally outreach was conducted to drive C&I rebate activity.

Table B9 (A) - Actual versus Approved Energy Savings

All Programs	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Actual - PNG	348,874	356,384	359,038							
Actual - NMU	96,962	101,363	175,558							
Actual - Total	**445,836**	**457,748**	**534,596**	**424,821**	**369,068**	**493,382**	**472,000**	**402,989**	**513,412**	**498,199**
Approved - PNG	324,510	392,079	450,423							
Approved - NMU	89,326	105,188	121,682							
Approved - Total	**413,836**	**497,268**	**572,106**	**394,949**	**357,561**	**453,194**	**460,536**	**531,810**	**541,514**	**552,566**
Savings Over(Under) Achieved - PNG	24,364	(35,695)	(91,386)							
Savings Over(Under) Achieved - NMU	7,636	(3,825)	53,876							
Savings Over(Under) Achieved - Total	32,000	(39,520)	(37,510)	**29,872**	**11,507**	**40,188**	**11,464**	**(128,821)**	**(28,102)**	**(54,367)**
Percent Achieved	**107.7%**	**92.1%**	**93.4%**	**107.6%**	**103.2%**	**108.9%**	**102.5%**	**75.8%**	**94.8%**	**90.2%**

Table B9 (B) - Actual versus Approved Energy Savings with Average Savings Method applied

Programs With Modified Residential Behavior Program	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Actual - PNG	307,872	327,393	322,081							
Actual - NMU	85,345	93,443	166,373							
Actual - Total	**393,217**	**420,837**	**488,454**	**424,821**	**369,068**	**493,382**	**472,000**	**402,989**	**509,758**	**468,544**
Approved - PNG	324,510	392,079	450,423							
Approved - NMU	89,326	105,188	121,682							
Approved - Total	**413,836**	**497,268**	**572,106**	**394,949**	**357,561**	**453,194**	**460,536**	**531,810**	**541,514**	**552,566**
Savings Over(Under) Achieved - PNG	(16,639)	(64,686)	(128,343)							
Savings Over(Under) Achieved - NMU	(3,981)	(11,745)	44,691							
Savings Over(Under) Achieved - Total	(20,620)	(76,431)	(83,652)	**29,872**	**11,507**	**40,188**	**11,464**	**(128,821)**	**(31,756)**	**(84,022)**
Percent Achieved	**95.0%**	**84.6%**	**85.4%**	**107.6%**	**103.2%**	**108.9%**	**102.5%**	**75.8%**	**94.1%**	**84.8%**

The impact that decoupling has had on MERC's CIP marketing is discussed in Section B.13 below. While factors unrelated to the Company's promotion of energy conservation have the potential to, and frequently do, affect actual energy savings achievements, MERC's decoupling pilot has been effective in achieving the goal of reducing the disincentive for the Company to encourage energy conservation.

B.10. MERC shall include a comparison of lifetime energy savings that can be attributed to the Company's CIP before and after the implementation of revenue decoupling.

Lifetime energy savings are detailed in Tables B10(A) and B10(B) below. Table B10(A) provides the information based on all programs, including the residential behavior program. Table B10(B) modifies the savings for the residential behavior program to reflect the changes in how the Department currently measures energy savings under the Average Savings Method. Lifetime energy savings are detailed by utility, by

Residential and C&I sectors, and by year. Under both scenarios, Post Year lifetime savings exceeds Base Year lifetime savings.

In prior reporting, MERC inadvertently did not include lifetime savings from Building Operator Training O&M savings, Multifamily Direct Install Plus, and Small Business Direct Install Plus programs in 2013 and 2014. The tables below have been corrected to include these programs. Overall lifetime savings have increased from Base Years to Post Years. In past decoupling evaluation reports, Table B10(A) included only one year of residential behavior program savings, rather than lifetime savings. This has been corrected.

Table B10 (A)- Lifetime Energy Savings

All Programs	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Residential Programs-PNG	2,620,919	3,270,852	2,950,696	2,947,489								
Residential Programs-NMU	425,622	453,505	412,951	430,693								
Residential Programs-Total	**3,046,541**	**3,724,357**	**3,363,647**	**3,378,182**	**3,274,790**	**3,341,899**	**3,789,697**	**3,994,962**	**2,962,037**	**3,100,130**	**3,349,181**	**3,410,586**
C&I Programs-PNG	2,361,120	1,726,282	2,095,077	2,060,826								
C&I Programs-NMU	557,135	1,045,860	2,222,509	1,275,168								
C&I Programs-Total	**2,918,255**	**2,772,141**	**4,317,585**	**3,335,994**	**3,059,724**	**3,125,297**	**3,631,203**	**2,835,370**	**3,593,757**	**5,075,013**	**3,563,788**	**3,553,394**
Total Lifetime Savings-PNG	4,982,039	4,997,134	5,045,773	5,008,315								
Total Lifetime Savings-NMU	982,757	1,499,365	2,635,459	1,705,860								
Total Lifetime Savings	**5,964,796**	**6,496,498**	**7,681,232**	**6,714,175**	**6,334,514**	**6,467,196**	**7,420,900**	**6,830,332**	**6,555,794**	**8,175,143**	**6,912,970**	**6,956,693**

Table B10 (B)- Lifetime Energy Savings with Average Savings Method Applied

Programs With Modified Residential Behavior Program	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Residential Programs-PNG	2,497,911	3,183,864	2,839,826	2,840,534								
Residential Programs-NMU	390,771	429,749	385,395	401,972								
Residential Programs-Total	**2,888,682**	**3,613,613**	**3,225,221**	**3,242,505**	**3,274,790**	**3,341,899**	**3,789,697**	**3,994,962**	**2,962,037**	**3,089,170**	**3,319,527**	**3,408,759**
C&I Programs-PNG	2,361,120	1,726,282	2,095,077	2,060,826								
C&I Programs-NMU	557,135	1,045,860	2,222,509	1,275,168								
C&I Programs-Total	**2,918,255**	**2,772,141**	**4,317,585**	**3,335,994**	**3,059,724**	**3,125,297**	**3,631,203**	**2,835,370**	**3,593,757**	**5,075,013**	**3,563,788**	**3,553,394**
Total Lifetime Savings-PNG	4,859,031	4,910,146	4,934,902	4,901,360								
Total Lifetime Savings-NMU	947,906	1,475,609	2,607,904	1,677,139								
Total Lifetime Savings	**5,806,937**	**6,385,754**	**7,542,806**	**6,578,499**	**6,334,514**	**6,467,196**	**7,420,900**	**6,830,332**	**6,555,794**	**8,164,183**	**6,883,315**	**6,950,890**

B.11. MERC shall include documentation in its evaluation and annual reports that shows for each existing CIP project any changes that have occurred in the number of participants, any reductions in gas use per participant, and any changes in the cost-effectiveness or any other measure that gauges the performance of these projects.

Due to the redesign of the CIP portfolio for the 2013-2015 Triennial Plan, it was not possible to provide information for CIP program changes by program. For example, in 2012, the Community Energy Services program was a stand-alone program. In 2013, the workshop and In-Home Audit portions of the program were included in the Residential sector support program while the actual rebates for improvements were included in the Residential Rebates program. Therefore, information here has been provided by sector.

The first two tables below detail by sector, by utility, and by year, participation in the three customer sectors, including and excluding the residential behavior program (Tables B11(A) and B11(B), respectively). The residential behavior program had a significant impact on participation, as many customers received Home Energy Reports. With this program being reintroduced in late 2018, an impact on participation in the Residential sector is apparent. Participation is one way of gauging the success of a

program. Excluding the impact of the Home Energy Reports, participation has continued to increase significantly from Base Years to Post Years, by individual year as well as by average of Base and Post years. In 2019, in Table B11(B), with the impact of the behavioral participants removed, a significant increase in participation in other Residential programs is apparent. This is significant for a small utility like MERC.

Table B11 (A) - Participation

All Programs	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Sector-PNG	288	262	217	256								
Low Income Sector-NMU	86	34	69	63								
Low Income Sector-Total	**374**	**296**	**286**	**319**	**401**	**343**	**404**	**448**	**624**	**888**	**1,110**	**603**
Residential Sector-PNG	52,858	64,506	63,915	60,426								
Residential Sector-NMU	13,205	13,336	12,075	12,872								
Residential Sector-Total	**66,063**	**77,842**	**75,990**	**73,298**	**18,805**	**17,456**	**21,721**	**20,942**	**19,459**	**86,552**	**96,587**	**40,217**
C&I Sector-PNG	257	268	869	465								
C&I Sector-NMU	82	131	338	184								
C&I Sector-Total	**339**	**399**	**1,207**	**648**	**2,442**	**5,941**	**7,513**	**6,224**	**6,961**	**6,337**	**7,419**	**6,120**
All Sectors-PNG	53,403	65,036	65,001	61,147								
All Sectors-NMU	13,373	13,501	12,482	13,119								
All Sectors-Total	**66,776**	**78,537**	**77,483**	**74,265**	**21,648**	**23,740**	**29,638**	**27,614**	**27,044**	**93,777**	**105,116**	**46,940**

Table B11 (B) - Participation

Programs Without Residential Behavior Program	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Sector-PNG	288	262	217	256								
Low Income Sector-NMU	86	34	69	63								
Low Income Sector-Total	**374**	**296**	**286**	**319**	**401**	**343**	**404**	**448**	**624**	**888**	**1,110**	**603**
Residential Sector-PNG	14,418	15,815	12,660	14,298								
Residential Sector-NMU	2,314	2,207	1,408	1,976								
Residential Sector-Total	**16,732**	**18,022**	**14,068**	**16,274**	**18,805**	**17,456**	**21,721**	**20,942**	**19,459**	**23,424**	**21,765**	**20,510**
C&I Sector-PNG	257	268	869	465								
C&I Sector-NMU	82	131	338	184								
C&I Sector-Total	**339**	**399**	**1,207**	**648**	**2,442**	**5,941**	**7,513**	**6,224**	**6,961**	**6,337**	**7,419**	**6,120**
All Sectors-PNG	14,963	16,345	13,746	15,018								
All Sectors-NMU	2,482	2,372	1,815	2,223								
All Sectors-Total	**17,445**	**18,717**	**15,561**	**17,241**	**21,648**	**23,740**	**29,638**	**27,614**	**27,044**	**30,649**	**30,294**	**27,232**

Another way of gauging success is by evaluating the cost to deliver the energy savings. The tables below detail cost per Dth saved by sector each year. Table B11(C) and B11(D) provide this information. Of special note is the increase from the average of the Base Years ($18.24 per Dth saved) to the average of the Post Years ($21.77 per Dth saved) without the impact of Home Energy Reports, which is a lower cost program. This is due to the combination of rising costs to implement programs and the declining cost of natural gas, both of which result in longer payback periods, which then require more marketing to obtain participation. The cost of energy savings is also impacted by the annual increase to cost per Dth saved for low-income programs. In 2019, the cost per Dth saved at the portfolio level increased in comparison to 2018.

Table B11 (C) - Cost per Dth Saved

All Programs	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Sector-PNG	$71.42	$77.78	$98.91	$82.71								
Low Income Sector-NMU	$77.83	$85.70	$98.93	$87.49								
Low Income Sector-Total	**$72.78**	**$79.13**	**$98.92**	**$83.61**	**$93.19**	**$120.33**	**$131.57**	**$137.61**	**$130.26**	**$160.09**	**$149.01**	**$131.72**
Residential Sector-PNG	$14.78	$17.27	$20.09	$17.38								
Residential Sector-NMU	$11.90	$13.30	$14.78	$13.33								
Residential Sector-Total	**$14.31**	**$16.70**	**$19.36**	**$16.79**	**$20.47**	**$19.38**	**$18.81**	**$22.45**	**$30.06**	**$28.66**	**$27.44**	**$23.90**
C&I Sector-PNG	$14.25	$11.73	$12.22	$12.74								
C&I Sector-NMU	$9.02	$14.10	$10.90	$11.34								
C&I Sector-Total	**$12.79**	**$12.47**	**$11.58**	**$12.28**	**$10.85**	**$15.09**	**$13.08**	**$12.31**	**$12.87**	**$11.14**	**$12.76**	**$12.59**
Total Portfolio-PNG	$17.78	$17.88	$20.70	$18.79								
Total Portfolio-NMU	$13.87	$16.74	$14.34	$14.98								
Total Portfolio-Total	**$16.93**	**$17.62**	**$18.61**	**$17.72**	**$20.32**	**$19.94**	**$17.98**	**$19.49**	**$26.08**	**$22.79**	**$25.50**	**$21.73**

Table B11 (D) - Cost per Dth Saved

Programs Without Residential Behavior Program	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Sector-PNG	$71.42	$77.78	$98.91	$82.71								
Low Income Sector-NMU	$77.83	$85.70	$98.93	$87.49								
Low Income Sector-Total	**$72.78**	**$79.13**	**$98.92**	**$83.61**	**$93.19**	**$120.33**	**$131.57**	**$137.61**	**$130.26**	**$160.09**	**$149.01**	**$131.72**
Residential Sector-PNG	$15.94	$17.63	$21.24	$18.27								
Residential Sector-NMU	$12.51	$13.10	$13.83	$13.14								
Residential Sector-Total	**$15.44**	**$17.04**	**$20.33**	**$17.60**	**$20.47**	**$19.38**	**$18.81**	**$22.45**	**$30.06**	**$27.83**	**$27.47**	**$23.78**
C&I Sector-PNG	$14.25	$11.73	$12.22	$12.74								
C&I Sector-NMU	$9.02	$14.10	$10.90	$11.34								
C&I Sector-Total	**$12.79**	**$12.47**	**$11.58**	**$12.28**	**$10.85**	**$15.09**	**$13.08**	**$12.31**	**$12.87**	**$11.14**	**$12.76**	**$12.59**
Total Portfolio-PNG	$18.76	$18.12	$21.36	$19.42								
Total Portfolio-NMU	$14.32	$16.97	$14.18	$14.97								
Total Portfolio-Total	**$17.80**	**$17.87**	**$18.91**	**$18.24**	**$20.32**	**$19.94**	**$17.98**	**$19.49**	**$26.08**	**$22.79**	**$25.82**	**$21.77**

The third way MERC gauges success is by the Societal Test. The Societal Test results for each year of the Base Years and the Post Years are based on post year analysis and are; therefore, actual results based on actual performance as approved in the Company's past status reports. The 2019 Societal Test results shown below are preliminary, as the 2019 Status Report has not yet been approved.

Two things should be noted with respect to these tables. The first is that the Low-Income sector was included in the Residential sector for the Base Years. The second is that the methodology and inputs for the benefit-cost analysis were changed for the Post Years, primarily as a result of the lower cost of gas.

Table B11 (E) - Societal Test Trend

All Programs	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Low Income Sector-PNG	n/a	n/a	n/a							
Low Income Sector-NMU	n/a	n/a	n/a	1.07	0.88	0.84	0.68	0.84	0.66	0.92
Residential Sector-PNG	6.39	5.44	4.78							
Residential Sector-NMU	6.17	7.44	6.50	1.67	2.22	2.19	2.86	1.45	1.49	1.96
C&I Sector-PNG	5.91	6.47	6.14							
C&I Sector-NMU	9.21	3.84	6.36	3.64	2.57	3.05	7.45	3.24	1.52	3.75
Total Portfolio-PNG	5.75	5.45	4.85							
Total Portfolio-NMU	6.88	4.37	5.97	2.13	2.18	2.61	3.10	1.92	1.42	2.33

Residential Sector in Base Years included Low Income Sector

Table B11 (F) - Societal Test Trend

Programs Without Residential Behavior Program	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Low Income Sector-PNG	n/a	n/a	n/a							
Low Income Sector-NMU	n/a	n/a	n/a	1.07	0.88	0.84	0.68	0.84	0.66	0.92
Residential Sector-PNG	4.88	4.66	3.80							
Residential Sector-NMU	3.97	5.83	6.22	1.67	2.22	2.19	2.86	1.45	1.50	2.00
C/I Sector-PNG	5.91	6.47	6.14							
C/I Sector-NMU	9.21	3.84	6.36	3.64	2.57	3.05	7.45	3.24	1.52	3.75
Total Portfolio-PNG	4.97	5.00	4.30							
Total Portfolio-NMU	5.99	3.98	5.69	2.13	2.18	2.61	3.10	1.92	1.43	2.36

Residential Sector in Base Years included Low Income Sector

As mentioned earlier, low-income programs continue to struggle with cost effectiveness due to the increase in required health and safety measures that do not produce savings and the number of walkaways. MERC continues to improve cost effectiveness in sectors where these barriers do not exist.

B.12. MERC shall document any specific actions the Company has undertaken that demonstrate a shift or realignment in the Company's support for energy conservation initiatives (e.g., efforts that would strengthen energy efficiency requirements in building codes and appliance standards at the national, state or local level).

MERC continues to support CIP programs in Minnesota. In several meetings with the Department, MERC has been praised for being the first to step up and actively build quality control into programs, such as the AIC program that ensures a high level of comprehensiveness and quality in insulation programs. In 2019, MERC expanded the AIC program's contractor training options in order to make training more accessible.

The 2017-2019 Triennial Plan filing added an incentive to C&I customers pursuing ENERGY STAR® Building Certification.

In 2017, MERC adopted the new UEF standard for minimum requirements associated with water heating measures. In addition, in 2019, MERC adopted ENERGY STAR® standards for water heating rebate eligibility requirements for both Residential and C&I rebate programs.

At the local level, MERC has engaged and supported customers who are building and/or recommissioning in Rochester's sustainability framework, an initiative in the Destination Medical Center district. In 2019, MERC promoted the City of Rochester's Benchmarking Data Jam session. Although not a formal MERC program, this was an engagement opportunity to support sustainable building performance standards, promote ENERGY STAR® building certification rebates, and other energy efficiency programs.

Lastly, in 2019, MERC also engaged in several planning stakeholder groups related to market transformation and codes and standards initiatives.

B.13. MERC shall include an analysis demonstrating the reasonableness of maintaining MERC's decoupling program given evidence that the level of savings generated by the Residential customer class has declined while the program has been in effect. MERC shall include (1) data showing its average Conservation Improvement Program (CIP) savings for the previous five years compared to the savings of its most recent complete year, and (2) an explanation for any differences in the CIP savings, including the likely impact of decoupling.

In its Findings of Fact, Conclusions, and Order in Docket No. G011/GR-15-736, the Commission ordered that MERC address energy conservation from the Residential class in its future annual decoupling filings.

Tables 13(A) and 13(B) below show Dth savings for the previous seven years of Residential savings (2011 through 2018) and the average of those eight years, followed

by the ninth year (2019). The charts are based on data in Table B1(C) CIP Savings All Programs, including all savings associated with behavior programs, and Table B1(D) CIP Savings with behavior programs adjusted to reflect the Department's Average Savings Method. In both Tables 13(A) and 13(B), the average of the eight years is lower than 2019 savings for Residential programs. For Low-Income programs, 2019 savings are greater than the eight-year average.

Table -13(A) - Average Savings 2011-2018 versus 2019

All Programs	2011	2012	2013	2014	2015	2016	2017	2018	2011-2018 Average	2019
Low Income	7,244	7,664	11,207	8,139	8,114	8,387	12,256	9,592	9,075	12,996
Residential	240,482	232,090	208,071	180,137	209,604	211,918	158,514	181,707	202,815	232,188
Total	247,726	239,754	219,278	188,276	217,718	220,305	170,770	191,299	211,891	245,184

Table -13(B) - Average Savings 2011-2018 versus 2019 with Average Savings Method applied

With Average Savings Method applied to Behavioral Program	2011	2012	2013	2014	2015	2016	2017	2018	2011-2018 Average	2019
Low Income	7,244	7,664	11,207	8,139	8,114	8,387	12,256	9,592	9,075	12,996
Residential	203,571	185,948	208,071	180,137	209,604	211,918	158,514	178,053	191,977	202,533
Total	210,815	193,612	219,278	188,276	217,718	220,305	170,770	187,645	201,052	215,529

As reflected in Table B1(D), which is duplicated below, the percentage change from the pre-decoupling period (2010-2012) to 2019, after modifying the energy savings associated with the Home Energy Reports project to reflect the changes in how the Department measures these energy savings, is an increase of 3.3 percent. The percentage increase for only Residential savings for Post Years compared to Base Years was one percent.

Table B1 (D) - CIP Savings with Average Savings Method applied to Behavioral Program

All Programs	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
Low Income Programs-PNG	8,337	6,009	5,710	6,685								
Low Income Programs-NMU	2,231	1,235	1,954	1,806								
Low Income Programs-Total	**10,567**	**7,244**	**7,664**	**8,492**	**11,207**	**8,139**	**8,114**	**8,387**	**12,256**	**9,592**	**12,996**	**10,099**
Residential Programs-PNG	153,452	176,987	163,200	164,546								
Residential Programs-NMU	26,137	26,584	22,748	25,157								
Residential Programs-Total	**179,590**	**203,571**	**185,948**	**189,703**	**208,071**	**180,137**	**209,604**	**211,918**	**158,514**	**178,053**	**202,533**	**192,690**
C&I Programs-Small C&I	n/a *	n/a *	n/a *	n/a *	n/a *	n/a *	n/a *	**13,523**	**5,874**	**4,725**	**6,294**	**7,604**
C&I Programs-PNG	146,083	144,398	153,171	147,884								
C&I Programs-NMU	56,977	65,624	141,671	88,091								
C&I Programs-Total	**203,060**	**210,022**	**294,842**	**235,975**	**205,542**	**180,792**	**275,664**	**238,173**	**226,344**	**317,388**	**246,721**	**241,518**
Total Savings-PNG	307,872	327,393	322,081	319,115								
Total Savings-NMU	85,345	93,443	166,373	115,054								
Total Savings	**393,217**	**420,837**	**488,454**	**434,169**	**424,821**	**369,068**	**493,382**	**472,000**	**402,989**	**509,758**	**468,544**	**448,652**
Change 2018 to 2019:				**(41,214)**	**-8.1%**							
Change Base Years Average to 2019:				**34,375**	**17.4%**							
Change Base Years Average to Post Years Average:				**14,483**	**3.3%**							

MERC did not separately report on the Small C&I class energy savings prior to 2016, and is therefore unable to provide an accurate comparison of 2019 Small C&I savings results to prior years. For 2010 through 2015, MERC allocated savings based on sales as reported in the Jurisdictional Reports. Table 13(C) below compares the estimated savings from Base Years to Post Years. The average savings for Base Years was 21,389 Dth and for Post Years, not including 2016 through 2019, was 26,308 Dth. Savings from program participation in 2016 through 2019 demonstrates that using a percentage of sales to allocate savings to the Small C&I customer class likely overstated savings from that class. Continuing to analyze savings by comparing customers in the Small C&I class to participation in C&I CIP programs provides a more accurate and relevant analysis. With the decreased savings in 2016, 2017, 2018, and

2019 (in comparison to pre-2016 savings), the Post Years average continues to be lower than the Base Years average.

Table 13(C)
Comparison of Small Business Savings Over the Years

Small C&I Only	2010	2011	2012	Base Years Average	2013	2014	2015	2016	2017	2018	2019	Post Years Average
C&I Programs - Small C&I	20,103	19,385	24,678	21,389	23,101	22,111	33,714	13,523	5,874	4,725	6,294	15,620

While numerous factors unrelated to MERC's promotion of energy conservation have the potential to, and frequently do, affect actual energy savings achievements, MERC believes its decoupling program has been successful in removing the disincentive to encourage energy conservation.

MERC notes that there have been several issues that have impacted Residential savings. These notes are followed by detailed information on the increased activity to create awareness and promote CIP programs to customers and trade allies.

- In 2010, at the height of the American Recovery and Reinvestment Act ("ARRA") funding, the Low Income Weatherization program produced almost 8,000 Dth of savings. In 2011, the year with the highest level of savings for the 2011 to 2016 period above, the program produced 5,851 Dth of savings. The CAP agencies lost a number of crews due to reduced funding after the ARRA funding was depleted. This limited the number of jobs they could complete. Based on anecdotal information received from the Company's agencies, it was also considered important for the agencies to use their federal funding first, rather than leverage MERC dollars, as use of federal funding affected future funding.

- The nature of MERC's service territory creates additional challenges for the delivery of energy efficiency programs. In many communities, there are less than 1,000 Residential customers, making it difficult for CAP agencies to find qualified low-income participants who are MERC customers. Moreover, in some areas, some CAP agencies will not engage with MERC due to low population density. In addition, required health and safety investments have increased not only in quantity but in price, and produce no quantifiable energy savings.

- In 2011 and 2012, MERC learned that some insulation contractors were not performing in a professional manner. To protect the Company's customers and maximize quality installations, an AIC program was implemented. For customers to receive a rebate for insulation and air sealing, they must use an AIC. This has significantly reduced the number of insulation rebates requested from over 2,000 in 2013 to just over 300 in 2014 and 2015 and fewer than 300 in years 2016 through 2018. In terms of savings, 2012 and 2013 produced insulation savings of 40,859 Dth and 40,366 Dth, respectively. However, after the implementation of the AIC program in September 2013, savings for insulation have dropped to 6,117 Dth in 2014; 6,314 Dth in 2015; 4,521 Dth in 2016; 3,559 Dth in 2017; 3,809 Dth in 2018; and 5,726 Dth in

2019. While MERC continues to be committed to quality over quantity, the changes have affected the Company's achievable savings.

- In the 2017-2019 Triennial period, Residential savings were significantly impacted by the new energy code. The new energy code reduced the savings from an average of 48.2 Dth per participant in 2016 down to 29.2 Dth per participant in 2017, 30.4 Dth in 2018, and 31.5 Dth in 2019. Consequently, a small reduction in participation resulted in a 37 percent to 41 percent reduction in savings.

- Another Residential program affected by claimable savings changes between triennial periods was the Water Kit program. In 2016, the average savings per water kit was 7.1 Dth per kit. In 2017, the average claimable savings per water kit dropped to 4.1 Dth per kit. The 2018 modification to reconfigure kits increased the average claimable savings per kit to 5.75 Dth.

- With the reintroduction of a behavior program in 2018, MERC will see lower first-year claimable energy savings in the Post Years program than when the project was in place during the Base Years due to the impact associated with the Average Savings Method.

- With the adoption of ENERGY STAR® water heaters in 2019, that category of residential measures observed a decrease in participants from 2018 to 2019 of 36 percent.

While the above issues may have detrimentally impacted Residential savings, the following are notable positive impacts:

- In 2018 and 2019, the Water Kit program exceeded program goals both with respect to participation and savings. To improve participation to small communities, MERC partnered with CERTs' Drops and Watts campaign to promote and distribute water conservation kits at various community events and public facilities. These events included county fairs, community events, city halls, and libraries. In addition to promoting these events via e-blasts and social media, MERC engaged city and community resources to jointly promote the kits in social media, community newsletters, and even a local television station. In 2018, MERC distributed 1,831 water conservation kits in 14 cities, 6 county fairs/community events, and 3 libraries through the Drops and Watts campaign. In addition, CERTs conducted outreach and distributed approximately 6,500 water kit business reply cards to 56 different cities in MERC's service territory. In combination with the increased saving per kit resulting from the modification and the increased promotions with CERTs, the Water Kit program exceeded its savings goals by 29 percent. This represented an improvement in savings of 81 percent over 2017. In 2019, through similar activities, increased savings per kit, and increased participation, MERC's Water Kit program exceeded its savings goals by 56 percent.

- In 2017 and 2018, MERC added several new partnership agreements for the In-Home Energy Audit program, which helped improve participation in the Residential sector support programs.

- The Company continued to drive rebate participation through customer and trade ally engagement. In 2019, MERC processed 14,786 rebate measures, similar to the number of rebate measures processed in 2018.

- Our Residential new construction program continues to deliver consistent results, which reflects a healthy new construction market. With the adoption of the new Minnesota Energy Code, savings per home dropped in 2017 and have remained lower as a result of higher baseline savings.

As mentioned in previous reports, with the multiple programmatic changes, it is extremely difficult, if not impossible, to isolate the impact of decoupling on Residential energy savings. Nevertheless, MERC believes its decoupling program has proven successful at effectively removing the disincentive to promote energy efficiency. Many tactics have been put into place or expanded since decoupling was implemented.

- Since 2011, MERC has hosted an annual meeting for all of the Company's implementation contractors. Initially, these meetings consisted of MERC informing the contractors about changes to existing programs. In the past several years, however, MERC has expanded the agenda to include brainstorming and problem-solving sessions about marketing and increasing awareness, referring customers to other programs, increasing coordination between contractors, and refining ideas for improving customer participation. One major achievement that has evolved is expanding the Company's Neighborhood Energy workshops to include representation from the local CAP agency and 4U2 contractor when possible to enable attendees (who are customers) to learn about more programs, obtain more detailed information about the programs from the implementation contractor, sign up for the programs immediately if appropriate, and meet the energy auditor in person.

- MERC has significantly increased the number of e-blasts sent to targeted audiences with very specific and relevant messages. As demonstrated below, the open and click-through rates for these e-blasts are exemplary.

    - In 2013, two e-blasts were sent to heating, ventilation, and air conditioning ("HVAC") trade allies—one related to heating system tune-up rebates and the second offering a special, limited-time bonus for commercial customer rebates. Of 307 and 411 recipients, open rates were 46.1 percent and 37.4 percent, respectively. Click-through rates (to rebate pages on the MERC website) were 53.7 percent and 26.1 percent, respectively.

    - In 2014, twelve e-blasts were sent. E-blasts to trade allies targeted either all trade allies, insulation trade allies, or HVAC trade allies. Of

over 1,853 recipients, the open rates ranged from 32.9 percent to 54.5 percent, and click-through rates ranged from 7.3 percent to 37.5 percent.

Eight of the e-blasts were sent directly to customers. For the Residential customer segment, the online audit completions allowed for targeted messages. Those whose responses demonstrated high opportunity for efficiency were referred to the in-home Residential Energy Audit program. Others were provided specific information about heating or water heater systems if those customers noted that their systems were older or provided insulation rebates if they selected low levels of insulation in the audit. For C&I customers, e-blasts informed customers about upcoming Building Operator Certification classes, the Company's (then) Benchmarking program, and the Small Business program. Of over 3,000 recipients, the open rates ranged from 31.4 percent to 63.3 percent, and click-through rates ranged from 8.1 percent to 31.2 percent.

- In 2015, 13 e-blasts were sent, reaching almost 4,200 recipients. Seven were sent to trade allies. Of those, one e-blast was targeted to agricultural grant writers and auditors and addressed agricultural rebates; one was sent to insulation contractors, and the others were sent to HVAC or general trade allies. Open rates ranged from 26.7 percent to 41.2 percent and click-through rates ranged from 5.9 percent to 30.3 percent.

  The six e-blasts sent to customers reached over 1,700 customers. Four e-blasts were sent to Residential customers, one to prior C&I Rebate program participants, and one to Small C&I customers. Open rates ranged from 29.9 percent to 60.5 percent and click-through rates ranged from 3.4 percent to 19.6 percent.

- The number of e-blasts sent in 2016 increased to 21 with over 7,500 recipients. Eight e-blasts went to trade allies, including buildings, CAP agencies, and community-based organizations such as Habitat for Humanity and housing and redevelopment authorities. HVAC and insulation contractors were reminded that tax credits for energy efficiency measures had been extended by Congress and builders were informed about improvements in rebates for new construction. Open rates ranged from 20.9 percent to 51 percent and click-through rates ranged from 0.6 percent to 56 percent.

  Topics for the eight Residential e-blasts included informing online audit participants about energy workshops in their community, next steps to increase energy efficiency based on in-home audit results, and reminders to past tune-up rebate recipients to tune-up their heating systems. The C&I customer e-blasts covered upcoming Building

Operator Training classes, reminders for past participants of boiler and furnace tune-ups and steam trap rebate recipients to keep their systems in good conditions, and a final email to Small C&I customers to inform them of the upcoming discontinuation of the Small Business Direct Install Plus program. Open rates for these e-blasts ranged from 23.2 percent to 58.2 percent.

- In 2017, the number of e-blasts jumped to 48. Twenty-nine e-blasts went to the Residential sector, reaching almost 22,000 customers with an open rate of 38 percent. Six e-blasts went to the C&I segment, reaching over 2,000 customers. The open rate was 23 percent. MERC also targeted trade allies with strategic messaging as detailed earlier. Thirteen e-blasts were sent, reaching over 3,500 trade allies. The open rate was 34 percent. The total open rate for all markets was 36 percent and the click through rate was 6.4 percent.

- In 2018, MERC implemented a total of 63 email campaigns, an increase of 31 percent over 2017. Thirty-one of those campaigns were directed to the Residential segment, with over 30,000 recipients and a 38 percent open rate. Eleven email campaigns went to the C&I segment, to 9,500 customers with a 32 percent open rate. Lastly, 21 campaigns went to trade allies or community organizations, which included 6,155 recipients, with a 31 percent open rate. For all campaigns, the Company maintained an open rate of 35 percent.

- In 2019, MERC delivered a total of 82 targeted email campaigns, an increase of 30 percent over 2018. Thirty-eight of those campaigns were directed to Residential customers, with over 65,000 recipients with an open rate of 33 percent. C&I customers received over double the amount of campaigns compared to 2018, with 23 campaigns sent to 14,267 recipients and an open rate of 31 percent. Lastly, the same number of campaigns were sent to trade allies and community partners as in 2018. However, the number of recipients was higher in comparison to 2018, totaling 6,807 recipients, with an open rate of 32 percent.

The average open rates vary by industry. However, in general, average open rates range from 12 to 28 percent, demonstrating that the Company's results are generally very high.

C. Revenue Deferred and Collected Under the RDM Adjustment

C. Revenue Deferred and Collected Under the RDM Adjustment

C.1. What was the monthly, annual, and cumulative amount of revenue deferred and recovered by customer rate class through the decoupling mechanism during the period being evaluated? A discussion describing actions leading to these adjustments will be provided.

Each month, the average distribution revenue per customer on an actual basis was compared to the baseline forecast approved in Docket No. G011/GR-17-563. The resulting monthly deferrals, as well as the annual result and cumulative balances, are provided in the table below. The Residential customer class is the only class shown, as the Commission's December 26, 2018, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-17-563, approved modifications to MERC's decoupling effective January 1, 2019, including removal of MERC's general service Small C&I customer class from decoupling.[2] 2019 resulted in credits for Residential customers associated with the 2019 decoupling mechanism. The 2019 deferral commenced with the surcharges and credits beginning March 1, 2020.

MERC
Table C1
2019

	Residential	
	Monthly	Cumulative
Jan	$ 1,024,763	$ 1,024,763
Feb	1,301,595	2,326,358
Mar	1,001,528	3,327,886
Apr	54,928	3,382,814
May	107,623	3,490,437
Jun	503,737	3,994,174
Jul	-	3,994,174
Aug	-	3,994,174
Sep	-	3,994,174
Oct	-	3,994,174
Nov	-	3,994,174
Dec	-	3,994,174
Total		$ 3,994,174

Positive numbers represent refunds to customers.

[2] While decoupling for the Small C&I class was terminated effective January 1, 2019, future reconciliation adjustments applicable to Small C&I customers for calendar years 2017 and 2018 will be necessary to account for differences in forecasted and actual sales. *See In the Matter of Minn. Energy Res. Corp.'s 2018 Annual Decoupling Eval. Report*, Docket No. G011/M-19-201, MERC RECONCILIATION ADJUSTMENT COMPLIANCE FILING (Jan. 15, 2020).

C.2. Has MERC made any changes to its methods or calculations of the decoupling deferral over the course of the pilot? Describe any such changes, their purpose, and impact on the deferral.

Beginning in July 2013, MERC consolidated its four purchased gas adjustments ("PGAs") into two. The decoupling mechanism was initially formatted to enter each PGA's customer class data separately under the four PGA setup. Starting in July 2013, instead of distinguishing between the various PGAs, the sales and customer count data were entered at the total MERC level by customer class. This had no effect on the decoupling mechanism calculation as the decoupling calculation is done at the total level.

For MERC's 2014 decoupling mechanism, the Company updated the forecasted sales and customer counts to match what was approved in MERC's 2014 rate case, Docket No. G011/GR-13-617. This did have an effect on the margin calculation used in the decoupling mechanism model, but synced up the margin with what was actually approved for rates in 2014.

In MERC's 2015 decoupling mechanism, the Company continued to use the forecasted sales and customer counts approved in MERC's 2014 rate case, Docket No. G011/GR-13-617. In addition, in May 2015, MERC finalized the acquisition of IPL's natural gas distribution assets and customers and began including the actual sales and customer counts in the revenue decoupling calculation. Since MERC's decoupling mechanism is done on a use-per-customer basis, the acquisition of the IPL customers only effected the calculation to the extent the former IPL customers' average usage varies from the average use-per-customer approved in MERC's 2014 rate case, Docket No. G011/GR-13-617.

In MERC's 2016 decoupling mechanism, the Company updated the forecasted sales and customer counts to match what was filed and ultimately approved in MERC's 2016 rate case, Docket No. G011/GR-15-736. This did have an effect on the margin calculation used in the decoupling mechanism model, but synced up the margin with what was actually approved for rates in 2016. In addition, MERC initially used the interim revenue margin rates approved by the Commission in Docket No. G011/GR-15-736 in the decoupling calculation, but ultimately updated the margin rates that resulted from the October 31, 2016, Commission Order in Docket No. G011/GR-15-736.

In MERC's 2017 decoupling mechanism, MERC continued to use the forecasted sales and customer counts approved in MERC's 2016 rate case, Docket No. G011/GR-15-736.

In MERC's 2018 decoupling mechanism, which was filed on March 1, 2019, in Docket No. G011/M-19-201, MERC updated the forecasted sales and customer counts to match what was filed and ultimately approved in MERC's 2018 rate case, Docket No. G011/GR-17-563. This does have an effect on the margin calculation used in the decoupling mechanism model, but syncs up the margin with what was actually approved for rates in 2018. In addition, MERC initially used the interim revenue margin

rates approved by the Commission in Docket No. G011/GR-17-563 in the decoupling calculation, but ultimately updated the margin rates that were filed in MERC's March 13, 2019, Compliance Filing in Docket No. G011/GR-17-563.

In MERC's 2019 decoupling mechanism, MERC continued to use the forecasted sales and customer counts approved in MERC's 2018 rate case, Docket No. G011/GR-17-563. Further, the Commission's December 26, 2018, Findings of Fact, Conclusions, and Order in that docket approved the removal of MERC's general service Small C&I customer class from decoupling, effective January 1, 2019.

C.3. Were there any issues that arose regarding the methodology or input values for calculation of the accounting journal entries which implemented the decoupling deferral? Explain and quantify the impact of any changes in methodology or input values.

The consolidation during 2013 of MERC's four PGAs into two, as previously discussed, only affected the inputs into the decoupling model, but had no impact on the calculation of the decoupling deferral.

The update of sales and customer counts for the 2014 decoupling mechanism, as previously discussed, did not have any effect on the inputs, but did make the margin comparison of actuals to what was approved in rates consistent.

The inclusion of former IPL customers in the 2015 decoupling mechanism, as previously discussed, did not affect the type of data input into the calculation, but would have had an impact on the calculation to the extent the former IPL customers' average usage varied from the average use-per-customer approved in MERC's 2014 rate case, Docket No. G011/GR-13-617. The impact of the former IPL customers is no different than if any other customer was added to the system, e.g., a new subdivision, but, due to the number of customer additions, would have a more material effect on the calculation to the extent the former IPL customers have a difference in the average use-per-customer than that approved in Docket No. G011/GR-13-617.

The update of sales and customer counts for the 2016 and 2017 decoupling mechanism and then again in the 2018 and 2019 decoupling mechanism, as previously discussed, did not have any effect on the inputs, but did make the margin comparison of actuals to what was approved in rates consistent.

C.4. What was the pretax margin and net income impact resulting from the recoverable revenue deferrals for the period being evaluated as a result of the pilot? What percentage of total pretax margins and net income for the Company's operations is represented by these deferrals in each year?

MERC			
Table C4			
2019			
Line	Description	Reference	Amount
1	Decoupling Pre-Tax Margin		$ (3,994,174)
2	Effective Tax Rate-Operating		26.35%
3	Net Income Effect of Decoupling	Line 1 x (1-Line 2)	$ (2,941,677)
4	2019 Total Margin		$ 122,184,765
5	Decouple Margin as a % of Total Margin	Line 1 / Line 4	-3.27%
6	2019 Operating Net Income		$ 22,057,796
7	Decoupling Net Income as a % of Total Net Income	Line 3 / Line 6	-13.34%

C.5. What was MERC's Residential and Commercial & Industrial recorded gas margin revenue and recorded gas margin revenue per customer for 2010 through the period being evaluated, before and after decoupling deferrals?

MERC										
Table C5										
Distribution Margin (excluding CCRC in base rates)										
				2013 Pre-Decoupling Deferral	2013 Post Decoupling Deferral	2014 Pre-Decoupling Deferral	2014 Post Decoupling Deferral			
	2010	2011	2012							
Residential Gas Margin	$ 26,552,150	$ 32,647,483	$ 27,945,891	$ 33,070,295	$ 30,972,176	$ 38,984,778	$ 35,701,543			
Residential Customers	187,603	187,125	189,630	192,428	192,428	193,436	193,436			
Residential Gas Margin per Customer	$ 142	$ 174	$ 147	$ 172	$ 161	$ 202	$ 185			
Small C/I Gas Margin	$ 1,255,943	$ 1,437,591	$ 1,243,583	$ 2,108,400	$ 1,845,305	$ 2,342,522	$ 2,176,096			
Small C/I Customers	9,597	9,555	10,466	10,983	10,959	10,985	10,985			
Small C/I Gas Margin per Customer	$ 131	$ 150	$ 119	$ 192	$ 168	$ 213	$ 198			
	2015 Pre-Decoupling Deferral	2015 Post Decoupling Deferral	2016 Pre-Decoupling Deferral	2016 Post Decoupling Deferral	2017 Pre-Decoupling Deferral	2017 Post Decoupling Deferral	2018 Pre-Decoupling Deferral	2018 Post Decoupling Deferral	2019 Pre-Decoupling Deferral	2019 Post Decoupling Deferral
Residential Gas Margin	$ 29,944,555	$ 33,227,790	$ 34,695,576	$ 38,539,647	$ 36,687,775	$ 38,851,874	$ 43,517,637	$ 40,364,775	$ 45,067,349	$ 41,073,175
Residential Customers	200,979	200,979	210,638	210,638	210,041	210,041	212,391	212,391	215,212	215,212
Residential Gas Margin per Customer	$ 149	$ 165	$ 165	$ 183	$ 175	$ 185	$ 205	$ 190	$ 209	$ 191
Small C/I Gas Margin	$ 1,461,865	$ 1,521,261	$ 1,339,728	$ 1,568,542	$ 1,579,523	$ 1,730,870	$ 1,891,449	$ 1,933,750		
Small C/I Customers	9,983	9,983	8,777	8,777	8,632	8,632	10,052	10,052		
Small C/I Gas Margin per Customer	$ 146	$ 152	$ 153	$ 179	$ 183	$ 201	$ 188	$ 192		

C.6. What was the total amount of decoupling surcharge revenue collected from ratepayers each month of the period being evaluated?

Decoupling surcharge rates in effect for January and February 2019 were $0.01643 and $0.01774 for Residential and Small C&I, respectively. From March through December 2019, a credit rate of $0.01765 was in effect for Residential, and a surcharge rate of $0.00741 was in effect for Small C&I. The total credit and surcharge revenue collected from ratepayers each month as a result of the rates is as follows:

	Residential	Small C&I	Summary
	Refund/(Surcharge) Activity	Refund/(Surcharge) Activity	Refund/(Surcharge) Activity
Jan-19	$ (476,484.61)	$ (27,966.53)	$ (504,451.14)
Feb-19	$ (630,985.69)	$ (42,413.31)	$ (673,399.00)
Mar-19	$ (59,985.05)	$ (14,867.58)	$ (74,852.63)
Apr-19	$ 337,381.03	$ (5,813.54)	$ 331,567.49
May-19	$ 230,824.04	$ (3,208.81)	$ 227,615.23
Jun-19	$ 108,404.37	$ (1,452.59)	$ 106,951.78
Jul-19	$ 58,368.13	$ (474.88)	$ 57,893.25
Aug-19	$ 45,448.83	$ (1,369.04)	$ 44,079.79
Sep-19	$ 57,350.14	$ (918.56)	$ 56,431.58
Oct-19	$ 971,747.50	$ (1,658.74)	$ 970,088.76
Nov-19	$ 303,598.00	$ (5,210.52)	$ 298,387.48
Dec-19	$ 487,458.22	$ (9,490.56)	$ 477,967.66
	$ 1,433,124.91	$ (114,844.66)	$ 1,318,280.25

C.7. What is the monthly customer bill impact of the decoupling rate adjustment for customers during the recovery period? This should be expressed as an average monthly dollar amount collected and percentage based on the total decoupling amount to be collected divided by total estimated revenue for Residential customers.

In Docket No. G011/GR-17-563, the average Residential customer was forecasted to use 73 therms per month. In the 2019 decoupling calculation, the credit rate was calculated to be $0.02391 per therm. Therefore, the average monthly credit per Residential customer is expected to be $1.74.

In Docket No. G011/GR-17-563, the estimated average monthly Residential customer revenue was $59.99. Therefore, as a percentage, the average Residential customer will see a credit of 2.9 percent.

D. Proportion of Margin Lost to Company-Sponsored CIP Relative to the RDM Adjustment

D. Proportion of Margin Lost to Company-Sponsored CIP Relative to the RDM Adjustment

D.1. What was the annual amount of estimated lost margin due directly to Company CIP programs for Residential and Commercial & Industrial customers during 2019 relative to the RDM for the same customer groups? This analysis should display the estimated annual reduction in therms and margin ($).

Table D below shows the estimated lost margin due to MERC's CIP programs for Residential and Small C&I during 2019. In 2019, the CIP savings were calculated based on comparing the customers in the Small C&I class to the projects implemented by all C&I customers. In the early post-decoupling years, a percentage of C&I energy savings were allocated to the Small C&I segment based on sales.

Table D - 2019 Estimated Energy Savings and Lost Margin Due to CIP

Measures/Programs Added Due to Decoupling	Energy Savings (Therms)	Distribution Margin Rates	Lost Margin
Low Income Sector	129,957	$0.25419	$33,034
Residential Sector	2,025,330	$0.25419	$514,819
Small C/I Sector	62,940	$0.22480	$14,149
Large C/I Sector	2,467,212	$0.17612	$434,525
Total	4,685,439		$996,528

In comparison, Table D1 below shows monthly Residential and Small C&I refund and surcharge activity by month in 2019. Effective January 1, 2019, MERC's general service Small C&I class was removed from decoupling. However, the Small C&I class was subject to the RDM that was effective March 1, 2019 through February 29, 2020, for sales over the period January 1, 2018 through December 31, 2018.

Table D1: 2019 Residential and Small C&I Refund and Surcharge Activity

	Residential Refund/(Surcharge) Activity	Small C&I Refund/(Surcharge) Activity	Summary Refund/(Surcharge) Activity
Jan-19	$ (476,484.61)	$ (27,966.53)	$ (504,451.14)
Feb-19	$ (630,985.69)	$ (42,413.31)	$ (673,399.00)
Mar-19	$ (59,985.05)	$ (14,867.58)	$ (74,852.63)
Apr-19	$ 337,381.03	$ (5,813.54)	$ 331,567.49
May-19	$ 230,824.04	$ (3,208.81)	$ 227,615.23
Jun-19	$ 108,404.37	$ (1,452.59)	$ 106,951.78
Jul-19	$ 58,368.13	$ (474.88)	$ 57,893.25
Aug-19	$ 45,448.83	$ (1,369.04)	$ 44,079.79
Sep-19	$ 57,350.14	$ (918.56)	$ 56,431.58
Oct-19	$ 971,747.50	$ (1,658.74)	$ 970,088.76
Nov-19	$ 303,598.00	$ (5,210.52)	$ 298,387.48
Dec-19	$ 487,458.22	$ (9,490.56)	$ 477,967.66
	$ 1,433,124.91	$ (114,844.66)	$ 1,318,280.25

The Large C&I sector is not included in MERC's RDM calculation; therefore, no regulatory liability or asset has been calculated.

E. Impact of General Rate Cases During Implementation of the Pilot Program

E. Impact of General Rate Cases During Implementation of the Pilot Program

E.1. Did MERC file any rate cases during the pilot period? If so, when?

MERC filed three rate cases during the pilot period. A rate case based on a 2014 test year was filed in Docket No. G011/GR-13-617 on September 30, 2013; a rate case based on a 2016 test year was filed in Docket No. G011/GR-15-736 on September 30, 2015; and a rate case based on a 2018 test year was filed in Docket No. G011/GR-17-563 on October 13, 2017.

E.2. To the extent new base rates took effect during the pilot period, when did those new rates take effect and what impact did that have on the methods and mechanics of the deferral calculations? Please include changes to base therm sales, weather adjustments, and rate of return.

The 2014 decoupling mechanism was updated with the sales, customer counts, and distribution rates (less the Conservation Cost Recovery Charge ("CCRC")) that were ultimately approved in Docket No. G011/GR-13-617.

The 2015 decoupling mechanism continued to use the same forecasted sales, customer counts, and distribution rates (less the CCRC) used in the 2014 decoupling mechanism since base rates set in 2014 and 2015 were both set in MERC's 2014 rate case.

The 2016 decoupling mechanism was updated with the sales and customer counts that were filed and ultimately approved in Docket No. G011/GR-15-736. The interim distribution rates (less the CCRC) were initially used in the decoupling mechanism, but ultimately updated based on the rate design approved in the Commission's October 31, 2016, Order in Docket No. G011/GR-15-736.

The 2017 decoupling mechanism continued to use the same forecasted sales, customer counts, and distribution rates (less the CCRC) used in the 2016 decoupling mechanism since base rates set in 2016 and 2017 were both set in MERC's 2016 rate case.

The 2018 decoupling mechanism was updated with the sales and customer counts that were filed and ultimately approved in Docket No. G011/GR-17-563. The interim distribution rates (less the CCRC) were initially used in the decoupling mechanism, but ultimately updated based on the rate design approved by the Commission in its December 26, 2018, Order, as filed in MERC's March 13, 2019, Compliance Filing in Docket No. G011/GR-17-563.

The 2019 decoupling mechanism continued to use the same forecasted sales, customer counts, and distribution rates (less the CCRC) used in the 2018 decoupling mechanism since base rates set in 2018 and 2019 were both set in MERC's 2018 rate case.

F. New Customer Usage and Adjustment Under the RDM

F. New Customer Usage and Adjustment Under the RDM

F.1. What was the impact of new customers on the decoupling calculations for the period being evaluated? Specifically what was:

a. The number of customers used (by class) in the decoupling calculations;

b. The number of customers approved (by class) in the most recent general rate case;

c. The difference between a and b;

d. The margin associated with c; and

e. The per customer impact of d.

Table F1 - Customer Usage and Adjustment	
	Residential
Actual Customers in Decoupling Calculation	215,211
Approved Customers in Decoupling Calculation	210,331
Actual less Approved Customers	4,880
Difference in Customers x Average Actual Annual Use x Per Therm Rate	$1,022,423
Per Customer Impact of d	$ 4.75

F.2. Did MERC implement any changes to the methodology to account for new customers during the course of the pilot?

No changes to the methodology to account for new customers during the course of the evaluation period were necessary. As described in the Direct Testimony of Ms. Valerie Grace in Docket No. G007,011/GR-10-977, MERC's decoupling mechanism is calculated on a per-customer basis. The reason behind the per-customer basis is to:

> filter out any changes (increase or decrease) in the number of customers that would differ from those levels supporting the revenue approved by the Commission in a general rate case proceeded. Doing so will not only isolate the changes in usage and related distribution revenues for the number of customers that were used to determine the revenues approved in a general rate case proceeding; it will recognize the additional costs incurred by MERC to provide service to new customers. These costs include the addition of new services and meters as well as other expenses to serve new customers joining the system. This approach will allow MERC to continue to recover the cost of connecting new customers. Moreover, it will also prevent MERC from

recovering revenues for load losses associated with customers leaving the system.

F.3. What were the monthly numbers of customers served, by rate schedule, in the evaluation period being reported on?

Table F3 - Number of Customers	
	Residential
Jan-19	219,262
Feb-19	214,408
Mar-19	214,566
Apr-19	214,557
May-19	215,431
Jun-19	215,032
Jul-19	214,944
Aug-19	212,578
Sep-19	212,873
Oct-19	213,668
Nov-19	215,333
Dec-19	219,881
Monthly Average	215,211

F.4. What was the actual average usage for customers subject to the decoupling rider for the evaluation period being reported on?

The actual average annual usage per Residential customer in 2019 was 964 therms.

F.5. In this section, please also refer to and discuss the data regarding total sales volumes and total gas margin revenues provided in response to questions G1 and G2 below.

In the responses to questions G1 and G2 below, MERC has identified, by rate schedule, sales, and margin revenues for 2010 to 2019 actual, as well as the 2020 forecast. These sales and margins are not weather normalized and represent the actual data from year to year.

G. Related Rate and Customer Usage Information (Actual and Forecasted)

G. Related Rate and Customer Usage Information (Actual and Forecasted)

G.1. What were total therm sales volumes by rate schedule in the period being evaluated?

	ACTUALS										TOTAL
RATE SCHEDULE	TOTAL 2010	TOTAL 2011	TOTAL 2012	TOTAL 2013	TOTAL 2014	TOTAL 2015	TOTAL 2016	TOTAL 2017	TOTAL 2018	TOTAL 2019	FORECAST 2020
SC_INTERR	28,990,686	31,917,575	28,020,652	39,571,664	37,199,675	30,959,100	34,216,089	38,515,333	33,448,817	40,490,540	32,706,620
SC_JOINT	527,860	521,944	388,885	425,811	449,827	220,382	289,265	351,019	299,817	171,316	386,548
SC_LCI	79,999,173	85,965,329	74,202,360	96,596,507	106,101,306	83,496,419	91,741,417	99,881,147	114,240,242	122,802,278	107,549,499
SC_RES	159,126,553	163,964,334	137,124,435	181,296,462	201,388,459	154,688,267	162,516,165	171,847,747	200,903,182	207,368,286	195,000,000
SC_SCI	8,820,834	8,596,847	7,034,960	12,392,175	14,950,997	9,415,183	6,942,314	8,184,906	9,522,562	9,484,574	14,698,511
SC_TRNSP	442,458,897	455,923,761	522,937,889	497,478,521	554,826,052	473,628,027	543,082,339	534,853,299	570,373,316	607,475,183	601,403,310
Grand Total	719,924,003	746,889,790	769,709,181	827,761,140	914,916,316	752,407,378	838,787,589	853,633,451	928,787,937	987,792,178	951,744,489

G.2. What were total gas margin revenues by rate schedule in 2011 and each evaluation period?

	ACTUALS									TOTAL FORECAST
RATE SCHEDULE	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
SC_LCI	$14,954,066	$13,192,305	$17,421,453	$20,195,323	$15,004,750	$16,726,295	$17,051,752	$17,707,438	$22,432,995	**$17,743,066**
SC_RES	$32,647,483	$27,945,891	$37,479,743	$44,889,488	$34,190,323	$38,971,376	$40,157,001	$46,724,225	$53,834,092	**$48,137,700**
SC_SCI	$1,437,591	$1,234,583	$2,463,734	$3,125,356	$1,900,858	$1,383,048	$1,906,585	$2,117,214	$2,169,695	**$3,249,433**
Grand Total	**$49,039,140**	**$42,372,779**	**$57,364,930**	**$68,210,167**	**$51,095,931**	**$57,080,719**	**$59,115,338**	**$66,548,877**	**$78,436,781**	**$69,130,199**

G.3. What was the rate of average annual gas customer growth by rate schedule starting in 2011? How does this compare to MERC's historical levels of gas customer growth in the 2009-2010 period? What is the Company's forecast for future customer growth? What were the average annual customer count totals by rate schedule for the period being reported?

Part 1: Rate of Average Annual Gas Customer Growth by Rate Schedule.
Part 2: Companies forecast growth rate .
Part 3: What were the average annual customer count totals by rate schedule for the period being reported.

	ACTUALS										
	Part 3:	Part 3:	Part 3:	Part 3:	Part 3:	Part 3:	Part 3:	Part 3:	Part 3:	Part 3:	Part 3:
FIX CHARGE COUNTS/ MONTH:	AVERAGE	AVERAGE	AVERAGE	AVERAGE	AVERAGE	AVERAGE	AVERAGE	AVERAGE	AVERAGE	AVERAGE	AVE. FORECAST
SERVICECLASS	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
SC_INTERR	571	488	450	452	446	472	510	470	442	450	443
SC_JOINT	14	11	8	7	8	5	10	8	6	4	7
SC_LCI	11,516	11,436	10,731	10,412	10,429	12,321	14,506	14,239	12,923	13,561	13,495
SC_RES	187,603	187,125	189,630	192,428	193,436	200,979	210,638	210,041	212,391	214,292	216,398
SC_SCI	9,597	9,555	10,466	10,983	10,985	9,866	8,777	8,632	10,052	9,496	9,879
SC_TRNSP	165	165	165	166	171	173	235	210	228	392	233
Grand Total	209,465	208,780	211,451	214,449	215,475	223,816	234,676	233,600	236,042	238,195	240,455

	Part 1:	Part 1:	Part 1:	Part 1:	Part 1:	Part 1:	Part 1:	Part 1:	Part 1:	Part 2:
	Growth Rate	Growth Rate	Growth Rate	Growth Rate	Growth Rate	Growth Rate	Growth Rate	Growth Rate	Growth Rate	Growth Rate 2020F vs 2019
SERVICECLASS	2011 vs 2010	2012 vs 2011	2013 vs 2012	2014 vs 2013	2015 vs 2014	2016 vs 2015	2017 vs 2016	2018 vs 2017	2019 vs 2018	Actual
SC_INTERR	-14%	-8%	0%	-1%	6%	8%	-8%	-6%	2%	-2%
SC_JOINT	-22%	-24%	-19%	18%	-31%	88%	-16%	-28%	-42%	89%
SC_LCI	-1%	-6%	-3%	0%	18%	18%	-2%	-9%	5%	0%
SC_RES	0%	1%	1%	1%	4%	5%	0%	1%	1%	1%
SC_SCI	0%	10%	5%	0%	-10%	-11%	-2%	16%	-6%	4%
SC_TRNSP	0%	0%	1%	3%	1%	36%	-11%	9%	72%	-41%
Grand Total	0%	1%	1%	0%	4%	5%	0%	1%	1%	1%

G.4. What proportion of customers subject to decoupling was residential versus commercial during the pilot? What proportion of usage from customers subject to decoupling was residential versus commercial during the pilot?

On December 26, 2018, the Commission issued Findings of Fact, Conclusions, and Order in Docket No. G011/GR-17-563, approving modifications to MERC's decoupling effective January 1, 2019, removing MERC's general service Small C&I customer class from decoupling. Therefore, Residential customers are the only rate class subject to decoupling, and making up 100 percent of the customers subject to decoupling.

G.5. On a rate schedule basis, how has actual annual gas use per customer changed during 2011 through the period being evaluated?

USE PER AVERAGE FIX CHARGE CUSTOMER COUNT:	2010 ANNUAL	2011 ANNUAL	2012 ANNUAL	2013 ANNUAL	2014 ANNUAL	2015 ANNUAL	2016 ANNUAL	2017 ANNUAL	2018 ANNUAL	2019 ANNUAL	2020 Forecast ANNUAL
SERVICECLASS	USE PER CUST	USE PER CUST	USE PER CUST	USE PER CUST	USE PER CUST	USE PER CUST	USE PER CUST	USE PER CUST	USE PER CUST	USE PER CUST	USE PER CUST
SC_INTERR	50,816	65,360	62,273	87,522	83,416	65,591	67,090	81,948	75,716	89,946	73,790
SC_JOINT	38,390	48,932	47,799	64,680	58,042	44,076	28,927	43,877	49,488	48,947	58,550
SC_LCI	6,947	7,517	6,915	9,277	10,173	6,777	6,324	7,015	8,840	9,055	7,970
SC_RES	848	876	723	942	1,041	770	772	818	946	968	901
SC_SCI	919	900	672	1,128	1,361	954	790	948	947	999	1,488
SC_TRNSP	2,680,215	2,771,573	3,167,289	2,988,921	3,244,913	2,737,734	2,310,989	2,546,920	2,497,420	1,549,023	2,581,130
Grand Total	2,778,136	2,895,159	3,285,671	3,152,471	3,398,947	2,855,903	2,414,891	2,681,526	2,633,358	1,698,938	2,723,829

SERVICECLASS	CHANGE IN USE PER CUST 2011 VS 2010	CHANGE IN USE PER CUST 2012 VS 2011	CHANGE IN USE PER CUST 2013 VS 2012	CHANGE IN USE PER CUST 2014 VS 2013	CHANGE IN USE PER CUST 2015 VS 2014	CHANGE IN USE PER CUST 2016 VS 2015	CHANGE IN USE PER CUST 2017 VS 2016	CHANGE IN USE PER CUST 2018 VS 2017	CHANGE IN USE PER CUST 2019 VS 2018	CHANGE IN USE PER CUST 2020F vs 2019 Actual
SC_INTERR	14,544	-3,087	25,249	-4,106	-17,825	1,499	14,857	-6,231	14,230	-16,155
SC_JOINT	10,542	-1,133	16,881	-6,638	-13,966	-15,150	14,951	5,611	-541	9,602
SC_LCI	570	-602	2,362	896	-3,397	-452	690	1,825	215	-1,086
SC_RES	28	-153	219	99	-271	2	46	128	22	-67
SC_SCI	-19	-228	456	233	-407	-164	158	-1	52	489
SC_TRNSP	91,358	395,716	-178,368	255,992	-507,179	-426,746	235,932	-49,500	-948,397	1,032,107
Grand Total	117,023	390,512	-133,200	246,476	-543,044	-441,011	266,635	-48,169	-934,420	1,024,891

G.6. What has been the change in the Company's natural gas delivered average monthly price per therm by rate schedule during 2011 through the period being evaluated? Provide a detailed incremental chronological listing (including Docket No.) and price per therm impact of all rate adjustments (commodity, general rate case, decoupling, etc.) during 2011 through the period being evaluated. What was the cumulative impact factoring in all rate adjustments from the beginning of 2011 through the period being evaluated?

Please see Attachment A. The data has been split into two time frames—January 2011-June 2013 (the period before MERC's four PGAs were consolidated into two PGAs) and July 2013-2019.

G.7. What has been the natural gas commodity cost embedded in the average monthly price per therm values by rate schedule in the previous question and how did margin revenues (excluding recovery of gas commodity cost) change during 2011 through the period being evaluated? Provide a detailed incremental chronological listing (including Docket No.) and impact of all commodity adjustments during the 2011 through the period being evaluated. What was the total impact factoring in all adjustments from the beginning of 2011 through the period being evaluated?

Please see Attachment B. The data has been split into two time frames—January 2011-June 2013 (the period before MERC's four PGAs were consolidated into two PGAs) and July 2013-2019.

G.8. What is the Company's most recently available three-year forecast for (a) natural gas rates/prices; (b) numbers of customers by rate schedule; (c) usage per customer by rate schedule; and (d) overall therm volumes and margin revenues by rate schedule in each available projected future period?

NNG Residential					
	Year	Month	Commodity Cost per Therm	Distribution Margin	Effective Rate
	2020	1	$ 0.48126	$ 0.24686	$ 0.72812
	2020	2	$ 0.46127	$ 0.24686	$ 0.70813
	2020	3	$ 0.44843	$ 0.24686	$ 0.69529
	2020	4	$ 0.38042	$ 0.24686	$ 0.62728
	2020	5	$ 0.38387	$ 0.24686	$ 0.63073
	2020	6	$ 0.39157	$ 0.24686	$ 0.63843
	2020	7	$ 0.41042	$ 0.24686	$ 0.65728
	2020	8	$ 0.41547	$ 0.24686	$ 0.66233
	2020	9	$ 0.41302	$ 0.24686	$ 0.65988
	2020	10	$ 0.42137	$ 0.24686	$ 0.66823
	2020	11	$ 0.48222	$ 0.24686	$ 0.72908
	2020	12	$ 0.55077	$ 0.24686	$ 0.79763
	2021	1	$ 0.61087	$ 0.24686	$ 0.85773
	2021	2	$ 0.60947	$ 0.24686	$ 0.85633
	2021	3	$ 0.52337	$ 0.24686	$ 0.77023
	2021	4	$ 0.46437	$ 0.24686	$ 0.71123
	2021	5	$ 0.45527	$ 0.24686	$ 0.70213
	2021	6	$ 0.45397	$ 0.24686	$ 0.70083
	2021	7	$ 0.45872	$ 0.24686	$ 0.70558
	2021	8	$ 0.45887	$ 0.24686	$ 0.70573
	2021	9	$ 0.45367	$ 0.24686	$ 0.70053
	2021	10	$ 0.45822	$ 0.24686	$ 0.70508
	2021	11	$ 0.49347	$ 0.24686	$ 0.74033
	2021	12	$ 0.54897	$ 0.24686	$ 0.79583
	2022	1	$ 0.59957	$ 0.24686	$ 0.84643
	2022	2	$ 0.59392	$ 0.24686	$ 0.84078
	2022	3	$ 0.51037	$ 0.24686	$ 0.75723
	2022	4	$ 0.45562	$ 0.24686	$ 0.70248
	2022	5	$ 0.44222	$ 0.24686	$ 0.68908
	2022	6	$ 0.44182	$ 0.24686	$ 0.68868
	2022	7	$ 0.44727	$ 0.24686	$ 0.69413
	2022	8	$ 0.44922	$ 0.24686	$ 0.69608
	2022	9	$ 0.44357	$ 0.24686	$ 0.69043
	2022	10	$ 0.44932	$ 0.24686	$ 0.69618
	2022	11	$ 0.49847	$ 0.24686	$ 0.74533
	2022	12	$ 0.54742	$ 0.24686	$ 0.79428

Consolidated Residential					
	Year	Month	Commodity Cost per Therm	Distribution Margin	Effective Rate
	2020	1	$ 0.29505	$ 0.24686	$ 0.54191
	2020	2	$ 0.27065	$ 0.24686	$ 0.51751
	2020	3	$ 0.25694	$ 0.24686	$ 0.50380
	2020	4	$ 0.21573	$ 0.24686	$ 0.46259
	2020	5	$ 0.20693	$ 0.24686	$ 0.45379
	2020	6	$ 0.20963	$ 0.24686	$ 0.45649
	2020	7	$ 0.22798	$ 0.24686	$ 0.47484
	2020	8	$ 0.23278	$ 0.24686	$ 0.47964
	2020	9	$ 0.23158	$ 0.24686	$ 0.47844
	2020	10	$ 0.23468	$ 0.24686	$ 0.48154
	2020	11	$ 0.29153	$ 0.24686	$ 0.53839
	2020	12	$ 0.33758	$ 0.24686	$ 0.58444
	2021	1	$ 0.34968	$ 0.24686	$ 0.59654
	2021	2	$ 0.34678	$ 0.24686	$ 0.59364
	2021	3	$ 0.33618	$ 0.24686	$ 0.58304
	2021	4	$ 0.26893	$ 0.24686	$ 0.51579
	2021	5	$ 0.26583	$ 0.24686	$ 0.51269
	2021	6	$ 0.26853	$ 0.24686	$ 0.51539
	2021	7	$ 0.27203	$ 0.24686	$ 0.51889
	2021	8	$ 0.27193	$ 0.24686	$ 0.51879
	2021	9	$ 0.27023	$ 0.24686	$ 0.51709
	2021	10	$ 0.27203	$ 0.24686	$ 0.51889
	2021	11	$ 0.31803	$ 0.24686	$ 0.56489
	2021	12	$ 0.33103	$ 0.24686	$ 0.57789
	2022	1	$ 0.34113	$ 0.24686	$ 0.58799
	2022	2	$ 0.33623	$ 0.24686	$ 0.58309
	2022	3	$ 0.32293	$ 0.24686	$ 0.56979
	2022	4	$ 0.25193	$ 0.24686	$ 0.49879
	2022	5	$ 0.24753	$ 0.24686	$ 0.49439
	2022	6	$ 0.25113	$ 0.24686	$ 0.49799
	2022	7	$ 0.25533	$ 0.24686	$ 0.50219
	2022	8	$ 0.25703	$ 0.24686	$ 0.50389
	2022	9	$ 0.25613	$ 0.24686	$ 0.50299
	2022	10	$ 0.25863	$ 0.24686	$ 0.50549
	2022	11	$ 0.30528	$ 0.24686	$ 0.55214
	2022	12	$ 0.32198	$ 0.24686	$ 0.56884

NNG Small C/I					
	Year	Month	Commodity Cost per Therm	Distribution Margin	Effective Rate
	2020	1	$ 0.48126	$ 0.22251	$ 0.70377
	2020	2	$ 0.46127	$ 0.22251	$ 0.68378
	2020	3	$ 0.44843	$ 0.22251	$ 0.67094
	2020	4	$ 0.38042	$ 0.22251	$ 0.60293
	2020	5	$ 0.38387	$ 0.22251	$ 0.60638
	2020	6	$ 0.39157	$ 0.22251	$ 0.61408
	2020	7	$ 0.41042	$ 0.22251	$ 0.63293
	2020	8	$ 0.41547	$ 0.22251	$ 0.63798
	2020	9	$ 0.41302	$ 0.22251	$ 0.63553
	2020	10	$ 0.42137	$ 0.22251	$ 0.64388
	2020	11	$ 0.48222	$ 0.22251	$ 0.70473
	2020	12	$ 0.55077	$ 0.22251	$ 0.77328
	2021	1	$ 0.61087	$ 0.22251	$ 0.83338
	2021	2	$ 0.60947	$ 0.22251	$ 0.83198
	2021	3	$ 0.52337	$ 0.22251	$ 0.74588
	2021	4	$ 0.46437	$ 0.22251	$ 0.68688
	2021	5	$ 0.45527	$ 0.22251	$ 0.67778
	2021	6	$ 0.45397	$ 0.22251	$ 0.67648
	2021	7	$ 0.45872	$ 0.22251	$ 0.68123
	2021	8	$ 0.45887	$ 0.22251	$ 0.68138
	2021	9	$ 0.45367	$ 0.22251	$ 0.67618
	2021	10	$ 0.45822	$ 0.22251	$ 0.68073
	2021	11	$ 0.49347	$ 0.22251	$ 0.71598
	2021	12	$ 0.54897	$ 0.22251	$ 0.77148
	2022	1	$ 0.59957	$ 0.22251	$ 0.82208
	2022	2	$ 0.59392	$ 0.22251	$ 0.81643
	2022	3	$ 0.51037	$ 0.22251	$ 0.73288
	2022	4	$ 0.45562	$ 0.22251	$ 0.67813
	2022	5	$ 0.44222	$ 0.22251	$ 0.66473
	2022	6	$ 0.44182	$ 0.22251	$ 0.66433
	2022	7	$ 0.44727	$ 0.22251	$ 0.66978
	2022	8	$ 0.44922	$ 0.22251	$ 0.67173
	2022	9	$ 0.44357	$ 0.22251	$ 0.66608
	2022	10	$ 0.44932	$ 0.22251	$ 0.67183
	2022	11	$ 0.49847	$ 0.22251	$ 0.72098
	2022	12	$ 0.54742	$ 0.22251	$ 0.76993

Consolidated Small C/I					
	Year	Month	Commodity Cost per Therm	Distribution Margin	Effective Rate
	2020	1	$ 0.29505	$ 0.22251	$ 0.51756
	2020	2	$ 0.27065	$ 0.22251	$ 0.49316
	2020	3	$ 0.25694	$ 0.22251	$ 0.47945
	2020	4	$ 0.21573	$ 0.22251	$ 0.43824
	2020	5	$ 0.20693	$ 0.22251	$ 0.42944
	2020	6	$ 0.20963	$ 0.22251	$ 0.43214
	2020	7	$ 0.22798	$ 0.22251	$ 0.45049
	2020	8	$ 0.23278	$ 0.22251	$ 0.45529
	2020	9	$ 0.23158	$ 0.22251	$ 0.45409
	2020	10	$ 0.23468	$ 0.22251	$ 0.45719
	2020	11	$ 0.29153	$ 0.22251	$ 0.51404
	2020	12	$ 0.33758	$ 0.22251	$ 0.56009
	2021	1	$ 0.34968	$ 0.22251	$ 0.57219
	2021	2	$ 0.34678	$ 0.22251	$ 0.56929
	2021	3	$ 0.33618	$ 0.22251	$ 0.55869
	2021	4	$ 0.26893	$ 0.22251	$ 0.49144
	2021	5	$ 0.26583	$ 0.22251	$ 0.48834
	2021	6	$ 0.26853	$ 0.22251	$ 0.49104
	2021	7	$ 0.27203	$ 0.22251	$ 0.49454
	2021	8	$ 0.27193	$ 0.22251	$ 0.49444
	2021	9	$ 0.27023	$ 0.22251	$ 0.49274
	2021	10	$ 0.27203	$ 0.22251	$ 0.49454
	2021	11	$ 0.31803	$ 0.22251	$ 0.54054
	2021	12	$ 0.33103	$ 0.22251	$ 0.55354
	2022	1	$ 0.34113	$ 0.22251	$ 0.56364
	2022	2	$ 0.33623	$ 0.22251	$ 0.55874
	2022	3	$ 0.32293	$ 0.22251	$ 0.54544
	2022	4	$ 0.25193	$ 0.22251	$ 0.47444
	2022	5	$ 0.24753	$ 0.22251	$ 0.47004
	2022	6	$ 0.25113	$ 0.22251	$ 0.47364
	2022	7	$ 0.25533	$ 0.22251	$ 0.47784
	2022	8	$ 0.25703	$ 0.22251	$ 0.47954
	2022	9	$ 0.25613	$ 0.22251	$ 0.47864
	2022	10	$ 0.25863	$ 0.22251	$ 0.48114
	2022	11	$ 0.30528	$ 0.22251	$ 0.52779
	2022	12	$ 0.32198	$ 0.22251	$ 0.54449

OVERALL **THERM VOLUMES**: MERC FORECAST 2020-2022 FROM MOST RECENT BUDGET FORECAST.

SERVICECLASS	2020	2021	2022
SC_INTERR	32,706,620	39,340,196	39,340,196
SC_JOINT	386,548	451,148	451,148
SC_LCI	107,549,499	114,354,666	114,354,666
SC_RES	195,000,000	193,400,436	193,400,436
SC_SCI	14,698,511	8,734,961	8,734,961
SC_TRNSP	601,403,310	612,158,756	612,158,756
Grand Total	951,744,489	968,440,163	968,440,163

OVERALL **FIXED CHARGE/CUSTOMER COUNTS**: MERC FORECAST 2020-2022 FROM MOST RECENT BUDGET FORECAST. (Av

SERVICECLASS	2020	2021	2022
SC_INTERR	443	443	443
SC_JOINT	7	7	7
SC_LCI	13,495	13,617	13,617
SC_RES	216,398	218,327	218,327
SC_SCI	9,879	9,968	9,968
SC_TRNSP	233	231	231
Grand Total	240,455	242,593	242,593

USE PER CUSTOMER: MERC FORECAST 2020-2022 FROM MOST RECENT BUDGET FORECAST.

	AVE	AVE	AVE
SERVICECLASS	2020	2021	2022
SC_INTERR	73,790	88,798	88,798
SC_JOINT	58,550	64,755	64,755
SC_LCI	7,970	8,398	8,398
SC_RES	901	886	886
SC_SCI	1,488	876	876
SC_TRNSP	2,581,130	2,648,127	2,648,127
Grand Total	2,723,829	2,811,841	2,811,841

OVERALL **THERM VOLUMES**: {**GS** RATE SCHEDULES}: MERC FORECAST 2020-2022

SERVICECLASS	2020	2021	2022
SC_INTERR			
SC_JOINT			
SC_LCI	87,923,203	93,677,310	93,677,310
SC_RES	160,567,815	159,187,169	159,187,169
SC_SCI	8,580,701	5,291,595	5,291,595
SC_TRNSP			
Grand Total	257,071,718	258,156,074	258,156,074

OVERALL **DISTRIBUTION RATES FOR FORECAST**: {**GS** RATE SCHEDULES}: MERC FORECAST 2020-2022.

SERVICECLASS	2020	2021	2022
SC_INTERR			
SC_JOINT			
SC_LCI	0.16656	0.16662	0.16662
SC_RES	0.24686	0.24686	0.24686
SC_SCI	0.22251	0.22251	0.22251
SC_TRNSP			
Grand Total			

OVERALL **MARGIN REVENUES BY RATE SCHEDULE**: {**GS** RATE SCHEDULES}: MERC FORECAST 2020-2022.

SERVICECLASS	2020	2021	2022
SC_INTERR			
SC_JOINT			
SC_LCI	$14,644,878	$15,608,124	$15,608,124
SC_RES	$39,637,771	$39,296,944	$39,296,944
SC_SCI	$1,909,292	$1,177,433	$1,177,433
SC_TRNSP			
Grand Total	**$56,191,941**	**$56,082,501**	**$56,082,501**

H. Impact on MERC Low-Income and LIHEAP Customers

H. Impact on MERC Low-Income and LIHEAP Customers

MERC currently provides an annual CIP Status Report to the Department that includes a discussion of the Company's low-income CIP programs and participation.

The information that is provided for each CIP program includes:

- The approved participation goal and the actual number of participants served;
- The estimate of low-income and renter Residential customer participation levels anticipated in the CIP plan and an estimate of low-income and renter participation levels actually achieved, if applicable;
- The approved budget and actual expenditures;
- The approved energy and demand savings goals and the actual energy and demand savings achieved; and
- The cost effectiveness of the program based upon actual results from the utility, participant, ratepayer, and societal perspectives.

H.1. Did the Company change its natural gas therm savings through Company sponsored low-income programs for the post-decoupling implementation time period, as compared with the pre-decoupling time period? What were the annual audited low-income CIP savings (completed program basis) for the post-decoupling implementation time period for Company sponsored low-income programs?

The Company's savings through Company-sponsored low-income programs for the post-decoupling implementation time period increased as compared with the pre-decoupling time period primarily due to the increasing success of the 4U2 program and its inclusion in the Low-Income sector. Savings decreased from 2015 to 2016 for the Low Income Weatherization program. This decrease was due in part to impacts from the ARRA funding and the reduction of contractor work crews, increased requirements for health and safety measures that do not provide savings, the increased number of homes with vermiculite and other safety issues that customers must mitigate prior to being able to weatherize the home, and the difficulty in finding eligible customers to participate in the programs. In addition, CAP agencies prefer to spend their federal dollars first, rather than use utility dollars, to safeguard the best chance for future funding.

In 2019, the Low Income Weatherization program performed extremely well, exceeding the program savings goal at 110.7 percent. The 4U2 program exceeded its program savings goal at 112 percent.

Table H1 - Low Income CIP Savings

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
LI Weatherization - PNG	7,959	5,851	2,862							
LI Weatherization - NMU	2,231	1,228	308							
LI Weatherization - Total	10,190	7,079	3,169	3,644	2,733	2,855	2,072	3,478	4,035	4,525
4U2 - PNG	378	158	2,848							
4U2 - NMU	0	6	1,646							
4U2 - Total	378	164	4,495	7,563	5,406	5,259	6,316	8,778	5,556	8,471
LI Total - PNG	8,337	6,009	5,710							
LI Total - NMU	2,231	1,235	1,954							
LI Total	**10,567**	**7,244**	**7,664**	**11,207**	**8,139**	**8,114**	**8,388**	**12,256**	**9,592**	**12,996**

H.2. What were the associated lost margins from Company sponsored low-income CIP programs?

Lost margins from low-income programs are detailed in Table H2.

Table H2 - Low Income Lost Margins

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
LI Weatherization - PNG	$14,124	$11,361	$5,557							
LI Weatherization - NMU	$4,854	$2,970	$745							
LI Weatherization - Total	**$18,978**	**$14,331**	**$6,302**	$7,198	$5,960	$6,226	$4,969	$8,387	$10,489	$11,398
4U2 - PNG	$671	$307	$5,530							
4U2 - NMU	$0	$15	$3,982							
4U2 - Total	**$671**	**$321**	**$9,511**	$14,940	$11,788	$11,468	$15,145	$21,170	$14,443	$21,338
LI Total - PNG	$14,795	$11,668	$11,087							
LI Total - NMU	$4,854	$2,985	$4,727							
LI Total	**$19,649**	**$14,653**	**$15,814**	$22,138	$17,748	$17,693	$20,113	$29,557	$24,932	$32,736

H.3. Did MERC make any commitments to program funding, or program changes or expansions as part of any rate cases or other regulatory proceedings during 2010-2012 (pre-decoupling)? Identify the regulatory proceeding, and provide the program funding, or program changes or expansions MERC made in response.

MERC did not make any commitments to program funding, changes, or expansions as part of the rate case or any other regulatory proceeding, with the exception of the agreement made to increase its commitment to CIP if the decoupling mechanism was approved and to obtain input from interested parties regarding how that could be accomplished.

H.4. What program funding or program changes or expansions were implemented during the period 2013 through 2019 (post-decoupling implementation time period) for natural gas low-income CIP programs as compared with the 2010-2012 pre-decoupling time period? Identify each new, revised, or expanded programmatic change including scope and funding.

Since 2013, budgets for Low-Income sector programs have increased over pre-decoupling budgets representing a significant increase in available funding for low-income CIP programs. This is represented in Table H4.

Table H4 - Low Income Sector Budgets

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
LI Sector Total - PNG	$515,535	$834,675	$912,278							
LI Sector Total - NMU	$166,179	$277,993	$302,446							
LI Total	**$681,714**	**$1,112,668**	**$1,214,724**	**$1,279,730**	**$1,329,085**	**$1,479,855**	**$1,508,432**	**$1,850,824**	**$1,855,439**	**$1,860,054**

The 2015-2016 CIP Plan Extension added a measure option available for direct installation for the 4U2 program.

In 2017, MERC filed a modification to lift the 40 Percent Cap on Funding of Emergency Replacements for the Low Income Weatherization program. This same modification added two additional measure options available for direct installation for the 4U2 program.

In 2018, MERC filed a program modification to waive the co-pay associated with the 4U2 program to help remove barriers to participation.

H.5. Identify any other factors that may have contributed to an increase in limited-income CIP savings and/or new or expanded limited-income CIP program offerings.

Minimum CIP low-income spending requirements went from 0.2 percent of annual gross operating revenues to 0.4 percent in 2015.

MERC continues to deploy geographic targeting to promote the 4U2 program more efficiently. MERC intends to continue geographic outreach to its gas affordability program ("GAP") participants. MERC researches and pursues individually-metered low-income housing developments to ensure they are aware of their eligibility to participate in the low-income programs. MERC has also participated in key stakeholder groups to build program awareness.

H.6. What low-income CIP customer educational, informational, and outreach programs were implemented by the Company during the decoupling pilot period being evaluated? What were the primary messages, including dates of publication or broadcast, and estimated costs of each of these programs? Were any therm savings attributed to such programs referenced above in Section A, and if so, how much, and using what assumptions or studies?

During the Base Years, MERC worked with Community Action of Minneapolis ("CAM") to perform direct mail marketing for Low Income Weatherization. CAM tried to obtain information on those who were denied Low Income Home Energy Assistance Program

("LIHEAP") assistance because they exceeded the income guidelines, and market information to those households. CAM held quarterly meetings with CAP agencies and reminded them to refer customers ineligible for Low Income Weatherization to 4U2. In the fall of 2014, the contract with CAM to oversee MERC's Low Income Weatherization program was terminated. On a temporary basis, each CAP agency that was engaged with MERC customers dealt directly with MERC's implementation contract administrator. In 2015, MERC contracted with the Sustainable Resources Center to replace CAM as contract administrator for the Low Income Weatherization program.

MERC has continued to market the 4U2 program through bill inserts, e-blasts, MERC's website, brochures, community posters, at community events, and with application forms. Literature is made available to customers at events such as the Minnesota State Fair, county fairs, workshops, and other local events in which MERC participated. MERC has also developed and disseminated flyers and posters through senior centers, libraries, Meals on Wheels, etc. The Company is finding that community champions can help promote these programs. MERC has also promoted weatherization day messaging on social media. In addition, MERC's representatives are readily available to provide program information.

H.7. What information is captured and retained by MERC to track service provided to low-income customers in the normal course of business, including monitoring of participation in CIP and rate assistance programs?

As indicated in this report and in the annual CIP Status Report, low-income and limited-income participants were tracked separately (from other Residential customers) through Low-Income sector programs—Low Income Weatherization and the 4U2 programs. The CIP Multifamily Direct Install program also tracks low-income participants as defined by Department guidance for multifamily properties.

All LIHEAP recipient households are tracked in the State of Minnesota's eHeat system, which MERC personnel have access to and can work with Department staff and local energy assistance agency staff to run participation reports related to Energy Assistance for a number of low-income strategies and tactics. This access also benefits the CIP programs and other customer assistance efforts. MERC regularly uses this data to attempt to increase awareness of and promote customer participation in Minnesota's Energy Assistance program.

MERC also uses its customer information system to track Energy Assistance credits on the accounts of low-income households who apply for Cold Weather Rule ("CWR") protection, enabling these households to enter into a low-income payment agreement without having to provide any household income verification. MERC also does direct promotion of the CWR protections to all Residential customers. CWR data is tracked and reported to the Commission via the monthly CWR compliance questionnaire.

MERC's GAP enrollments experienced a decrease in 2019. MERC's surcharge having been at zero in 2018, was re-established, effective April 1, 2019, at a rate of $0.00905 per therm. There continues to be a number of customers with credit balances who continue to take advantage of the monthly affordability credit on their gas bill. GAP continues to provide a monthly billing adjustment to all enrolled customers based on annual household income and gas consumption, making winter bills much more affordable. Customers can remain enrolled in this component indefinitely, as long as they remain Energy Assistance program recipients each program year. MERC's GAP continues to be very successful, maintaining a very high retention rate. The total program spending was $661,786 in the 2019 program year.[3] All participation and the financial impacts are reported through the annual GAP report filing.

In addition, in 2019, the 4U2 program provided weatherization and emergency heating and water heating equipment replacements at little to no cost to customers. This is being done to further help those who are trying to reduce or eliminate arrearages and pay their bills.

In addition to the CIP Low Income Weatherization program, MERC also promotes Minnesota's Weatherization Assistance program ("WAP"). Households that participate in WAP and the jobs completed are tracked in a separate section of the eHeat system to which MERC does not have direct access rights.

Previously, MERC had anecdotally reported that low-income customers likely participated in other Residential programs in its' annual Status Reports. Starting in 2019, the Company has since been able to identify customers who have received Low Income Energy Assistance Payments and thereby verified low-income. This has been cross-referenced to participants in non-low-income CIP programs. Outside of what is reported below in Table H9(B), the following participants were verified low-income: 16 in Residential sector support, 337 in existing rebates, which includes free water kits, and 2,695 receiving Home Energy Reports. The estimated additional spending associated with the verified low-income participants in non-low-income programs is $68,858.

H.8. Identify and summarize any further information or data available that would assist in the determination of whether or not decoupling has a disproportionate impact on low-income customers.

MERC is unaware of any further information or data that is available that would assist in the determination of whether or not decoupling has a disproportionate impact on low-income customers.

[3] By order dated March 28, 2019, in Docket No. G011/GR-17-563, MERC's GAP surcharge was set at $0.00905 per therm

H.9. What were the total low-income CIP expenditures for the period being evaluated? Did MERC make any commitments regarding funding levels as part of any rate cases or other regulatory proceedings? What is MERC's best estimate of the proportion of low-income participation in each of its conservation programs and how were such estimates derived?

The total expenditures for the Low-Income sector by program are detailed below.

Table H9(A) - Low Income Project Expenditures

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
LI Weatherization - PNG	$543,644	$400,130	$218,945							
LI Weatherization - NMU	$173,617	$89,705	$24,184							
LI Weatherization - Total	$717,261	$489,834	$243,129	$276,522	$288,493	$369,137	$293,083	$423,762	$535,865	$628,286
4U2 - PNG	$51,801	$67,248	$345,858							
4U2 - NMU	$0	$16,119	$169,123							
4U2 - Total	$51,801	$83,367	$514,980	$767,901	$662,259	$667,377	$826,145	$1,172,699	$999,665	$1,308,246
LI Total - PNG	$595,445	$467,377	$564,803							
LI Total - NMU	$173,617	$105,824	$193,307							
LI Total	**$769,062**	**$573,201**	**$758,110**	**$1,044,422**	**$950,752**	**$1,036,515**	**$1,119,228**	**$1,596,460**	**$1,535,530**	**$1,936,532**

In addition to low-income sector projects, not reflected in table H9(A), MERC had an additional $132,857 in low-income spending in programs that are outside of the Low-Income sector as approved spending by the Department. Due to MERC's enhanced ability to cross check Energy Assistance program recipients to CIP participation, there is an estimated additional $68,858 in programs outside of the Low Income sector, as addressed above. Currently, most of the non-Low Income sector spending comes from the Multifamily program where, starting in 2014, MERC has been allowed to claim low-income spending when properties are verified using Department guidance on multifamily properties.

The total low-income participation for all CIP programs is detailed below. This only represents participation when incomes are verified by Department-approved methods.

Table H9(B) - Low Income Participation in All Projects

Project	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
LI Weatherization - PNG	278	240	118							
LI Weatherization - NMU	87	32	10							
LI Weatherization - Total	**365**	**272**	**128**	131	124	158	109	195	190	189
4U2 - PNG	10	0	13							
4U2 - Total	0	0	34							
4U2 - NMU	**10**	**0**	**47**	270	219	246	339	429	698	921
Res Sector Support - PNG	31	82	109							
Res Sector Support - NMU	7	3	2							
Res Sector Support - Total	**38**	**85**	**111**	198	232	n/a	n/a	n/a	n/a	n/a
Res Rebates - PNG	1,747	2,694	1,483							
Res Rebates - NMU	643	749	342							
Res Rebates - Total	**2,390**	**3,443**	**1,825**	1,854	1,692	n/a	n/a	2	2	84
Multifamily Project	0	0	0	197	3,809	3,811	1,706	4,204	2,302	2,031
All Projects - Total	**2,803**	**3,800**	**2,111**	**2,650**	**6,076**	**4,215**	**2,154**	**4,830**	**3,192**	**3,225**

Note the 2019 CIP Status Report is not approved yet; therefore, the 2019 data in Table H9(A) and H9(B) should be considered preliminary. It should also be noted that low income status data is no longer being collected through self-reporting from application forms starting 2015 for Residential Sector Support or Residential Rebates. In addition, MERC received approval to include Low Income new construction activity in participation and spending rates.

It is a challenge for all utilities, including MERC, to estimate what percentage of income-eligible households apply for and receive assistance from its Energy Assistance program. As indicated in Table H10 below, 13,125 eligible MERC customers received grants from Minnesota's Energy Assistance program in 2019.

Collectively, MERC's Low-Income sector CIP programs delivered 1,110 measures to low-income customers in 2019. When considering participation outside of the Low-Income sector, all CIP programs delivered 2,115 measures to low-income customers in 2019.

The Low Income Weatherization program provided a total of 189 measures to 120 individual customers, all of whom would have been eligible for Energy Assistance. The 4U2 program provided 698 measures to 286 customers. Within the 4U2 program, 129 individual customers were identified as up to 200 percent of the poverty guideline (the income qualification threshold for WAP and MERC's Low Income Weatherization program) and 157 customers were defined as up to 300 percent of the poverty guidelines (the income qualification threshold for the 4U2 program). Therefore, only one percent of MERC's LIHEAP recipients participated in the CIP Low Income Weatherization program in 2019. Based on the most recent Department data available, approximately 30 percent of the estimated income-eligible Minnesota households receive Energy Assistance benefits

H.10. What was the total distribution of LIHEAP funds to low-income customers for the period being evaluated?

The following chart provides the total amount of Minnesota Energy Assistance program credits (funded by Federal LIHEAP dollars) to MERC customers:

Table H10 - Low Income Energy Assistance (LIHEAP) Recipients

Federal Fiscal Year	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Primary Heat Received	$6,679,917	$4,764,886	$3,800,469	$4,229,929	$4,347,618	$4,310,273	$4,055,197	$4,150,638	$4,434,267	$4,215,249
Crisis Received	$553,701	$699,473	$223,455	$329,027	$594,148	$296,737	$139,771	$257,757	$430,348	$504,712
PH & Crisis Total	$7,233,618	$5,464,359	$4,023,924	$4,558,956	$4,941,766	$4,607,010	$4,194,968	$4,408,395	$4,864,615	$4,719,961
# of Households Served	14,414	14,727	13,610	12,717	13,204	13,731	12,675	12,320	13,129	13,125

I. Other Information

I. Other Information

I.1. Was the decoupling pilot program in Minnesota recognized in any public reports issued by credit rating agencies or financial analysts? If so, provide a copy of the report.

Credit Rating Agencies

To MERC's knowledge, there was no mention of MERC's decoupling pilot program within any credit rating agency reports during 2019.

Financial Analysts

To MERC's knowledge, there has been no mention of MERC's decoupling pilot program within financial analyst reports during 2019.

I.2. Is there any other information that would be helpful to the Commission in the evaluation of the decoupling pilot program?

a. A comparison of how revenues under traditional regulation would have differed from those collected under the decoupling pilot program;

Under the RDM, MERC created a revenue adjustment which resulted in an overall regulatory liability. For 2019, this net liability is comprised of a credit for Residential customers. MERC began collecting and crediting to customers effective March 1, 2020. Had the RDM not been in place in 2019, MERC would have recognized higher revenues of $3,994,174 for Residential customers.

On December 26, 2018, the Commission issued Findings of Fact, Conclusions, and Order in Docket No. G011/GR-17-563, approving removal of MERC's general service Small C&I customer class from decoupling, effective January 1, 2019. Therefore, the 2019 RDM did not include a calculation of a credit or surcharge for the Small C&I rate class.

Concurrently with the results of the 2019 RDM, the over-collected amount of $399,861 for Residential customers related to the 2017 RDM customer surcharge in effect March 1, 2018, through February 28, 2019, was added to the credit surcharge rate for Residential customers. Additionally, Small C&I customers had an under-collected amount of $40,447 related to the 2017 RDM customer surcharge in effect March 1, 2018, through February 28, 2019. This under-collected amount became the basis for the 2019 RDM calculation for Small C&I customers.

b. An evaluation of if the pilot stabilized revenues for the classes under the pilot and how has such stabilization impacted the utility's overall risk profile;

The decoupling deferral for 2019 was $4 million, or about 1.41 percent of total revenue. Thus, the program had little impact on total revenue.

c. An evaluation of any problems encountered and improvements/ suggestions for the future;

MERC's decoupling pilot was recently evaluated by the Commission and interested stakeholders in Docket No. G011/GR-17-563, and during the course of that evaluation MERC agreed to discontinue application of the RDM to the Small C&I customer class beginning January 1, 2019. At this time MERC, has no suggestions for improvements to the RDM in the future.

d. MERC will continue to provide annual service quality reports which currently measure and report:

1) Call center response times;

2) Meter reading performance data;

3) Reference to service disconnection data submitted under Minn. Stat. §§ 216B.091 and 216B.096;

4) Service extension request response time data;

5) Customer deposit data;

6) Customer complaint data;

7) Telephone answer times for gas emergency phone line;

8) Mislocate data;

9) Damaged gas lines;

10) Service interruptions;

11) Summaries of major events that are immediately reportable to the Minnesota Office of Pipeline Safety and summaries of all service interruptions caused by system integrity pressure issues;

12) Gas emergency response times; and

13) Customer-service related operations and maintenance expenses.

MERC agrees that it will continue to provide the annual service quality reports with the currently-reported data. These reports are typically filed on May 1 of each year.

e. As part of its initial Evaluation Report Filing, MERC will also provide recent historical information on the above metrics in subsection d, which it has available in order to assist the Commission in determining a "baseline" service quality level prior to implementation of the pilot program, and will fully comply with any other service quality reporting obligations established in other dockets.

Attachment C is MERC's 2012 Annual Gas Service Quality Report to serve as the "baseline" service quality level prior to implementation of the pilot program.

f. Compliance with Prior Commission Orders

In its September 26, 2014, Order accepting MERC's 2013 revenue decoupling evaluation report, the Commission required MERC to include in its 2014 annual decoupling report an estimate of each class' revenues under the following decoupling scenarios:

- No Decoupling
- Partial Decoupling
- Full Decoupling

As explained in MERC's Reply Comments filed on June 30, 2014, based on conversations with the Department, MERC understands that the Department intended the term "full decoupling" to mean MERC's currently-approved pilot decoupling program. MERC notes that its approved decoupling mechanism applies only to Residential customer classes and includes a symmetrical 10 percent cap on surcharges and refunds. For purposes of the information required to be provided, MERC will assume decoupling applies to all rate classes. Additionally, MERC understands partial decoupling to be a revenue-per-customer decoupling mechanism that removes the effect of weather from decoupling deferrals (i.e., Weather Normalized Decoupling). Included as Attachment D is a spreadsheet estimating each class' revenues with no decoupling, under full decoupling (both with and without a 10 percent cap), and under a Weather Normalized Decoupling (both with and without a 10 percent cap). This attachment organizes the customers and sales beginning in 2018 into MERC's new customer classes as approved by the Commission in Docket No. G011/GR-17-563.

On August 17, 2016, the Commission issued an Order in Docket No. G011/GR-10-977, accepting MERC's 2015 Decoupling Evaluation Report and requiring MERC to file, no later than May 1, 2017, an Excel file that revises the December 2015 data for the Small Volume Transport, Large Volume Transport, and Super Large Volume Interruptible and Joint customer classes. On November 15, 2016, MERC submitted a restated Excel file revised to restate the December 2015 customer counts for customers who were not

billed in December 2015 and were billed twice in January 2016. In accordance with the Commission's April 17, 2016, Order and MERC's November 15, 2016, Compliance Filing in Docket No. G011/GR-10-977, Attachment D includes both actual data for 2015 and 2016 based on MERC's billing data from its billing system (under the tabs labeled "actual") and restated December 2015 and January 2016 data to restate customer counts for customers who were not billed in December 2015 and were billed twice in January 2016. The restated data is highlighted in yellow on the tabs labeled "2015 Restated" and "2016 Restated."

In its October 31, 2016, Order in Docket No. G011/GR-15-736, the Commission required that in MERC's future annual decoupling evaluation filings, the Company include an analysis of the financial consequences for ratepayers and MERC of extending the decoupling program to all customer classes with more than 50 customers. MERC may also include an analysis of the financial consequences of extending its decoupling program to any other combination of customer classes. Additionally, with the removal of the general service Small C&I customer class from decoupling beginning on January 1, 2019, in Docket No. G011/GR-17-563, the Commission ordered this reporting requirement extended to the General Service Small C&I customer class.

An analysis of the financial consequences for ratepayers and MERC of extending decoupling to each customer class is included in Attachment D[4]. In 2019, MERC's decoupling program was only applicable to Residential customers.

In Column P of each of the actual results tabs within Attachment D is a surcharge rate based on an estimation of each class' revenues under full decoupling (both with and without a 10 percent cap), and under a Weather Normalized Decoupling (both with and without a 10 percent cap). This surcharge is then applied to the average customer usage in that class (Column R), as well as a hypothetical low end usage customer (50 percent of actual average usage) (Column Q) and high end usage customer(150 percent of actual average usage) (Column S). For purposes of this analysis in 2009 - 2017, MERC grouped the customers into the following categories: Residential, General Service Small C&I, General Service Large C&I, Small Volume Interruptible & Joint Sales, Large Volume Interruptible & Joint Sales, Small Volume Interruptible & Joint Transport, Large Volume Interruptible & Joint Transport (inclusive of Flex customers), and Super Large Volume Interruptible & Joint Transport. Beginning in 2018, MERC grouped the customers into the approved rate classifications from Docket No. G011/GR-17-563 as follows: Residential, Firm Class 1, Firm Class 2, Firm Class 3, Agricultural Grain Dryer Class 1, Agricultural Grain Dryer Class 2, Agricultural Grain Dryer Class 3, Power Generation Class 1, Power Generation Class 2, Interruptible Class 2, Interruptible Class 3, Interruptible Class 4, and Interruptible Class 5.

Using 2019 as an example, an average Firm Class 1 customer under MERC's current program with the 10 percent cap would experience a surcharge rate of $0.00005 per therm (cell P45), and with average 2019 usage of 999 therms, would expect an annual

[4] Note that MERC has found and corrected an error in the Distribution Rate reflected for Firm Class 3 on the "2018 Forecast" and "2018 Actual" tabs.

surcharge of $0.05. A customer that is on the high end for this example would experience an annual surcharge of $0.07, based on 1,498 annual therms usage.

In its December 1, 2017, Order in Docket No. G011/GR-15-736, the Commission ordered MERC to include in its 2017 RDM report an analysis of how extending the RDM to other customer classes would impact overall rates for the period 2013-2017. To provide this analysis, a rate analysis tab was included in Attachment D, which calculates what the actual revenue refunded or surcharged to each customer grouping would have been if decoupling was applicable to all customer classes. For example, in 2017, MERC would have collected revenues totaling $235,283,538, absent the existence of any decoupling. However, based on decoupling rates that would have been in effect during 2017, MERC would have collected an additional $5,641,254 for a total revenue collection of $240,924,792. MERC has continued this analysis into 2018 and 2019, and it is provided in Attachment D.

In its December 26, 2018, Findings of Fact, Conclusions, and Order in Docket No. G011/GR-17-563, the Commission required MERC to provide an updated analysis of the impact on customers of extending its RDM to all classes with 50 or more customers when MERC files its next rate case. MERC will address this requirement in the Company's next rate case, but notes that the Company continues to have concerns with the expansion of decoupling to other rate classes. Most notably, MERC is concerned about the expansion of decoupling to interruptible customers. To the extent these customers are interruptible; it would mean that if MERC were to interrupt their usage, thereby reducing sales, then all else equal, MERC would effectively recoup at least a portion of this revenue via the decoupling mechanism for sales that did not occur because MERC interrupted those customers. MERC could effectively recover its lost revenues for sales MERC did not provide due to limitations within MERC's own system. Such a result seems contrary to the purpose of interruptible natural gas service.

While MERC has identified concerns with expanding decoupling to its larger customer classes, consistent with the Commission's Findings of Fact, Conclusions, and Order in Docket No. G011/GR-17-563, MERC will continue to evaluate its program parameters and the effect of decoupling on additional classes. MERC appreciates the concerns and ideas the stakeholders have raised and MERC looks forward to working with stakeholders to determine the program parameters that will yield the most value to the Company and our customers.

g. Any other information that can provide assistance to the Commission in its evaluation.

Colder than normal weather was experienced in 2019, and, because of that, Residential customers will be credited an over-collection of revenues. The rate for the credit will be $0.02391. This rate is calculated by dividing the balance of the over-collection in 2019 and the over-collected amount from MERC's 2017 decoupling refund by the sales forecast approved in Docket No. G011/GR-17-563. In addition, it should be noted that the 10 percent cap on distribution revenue was not exceeded under the Residential decoupling mechanism.

ATTACHMENT **A**

NNG Residential

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2011	1	0.61103	0.17746	-0.00428		0.78421		Final Rates per Docket No. G007,011/GR-08-836
2011	2	0.61794	0.19417	-0.00428		0.80783	0.02362	Interim Rates per Docket No. G007,011/GR-10-977
2011	3	0.60496	0.19417	-0.00428		0.79485	-0.01298	
2011	4	0.6133	0.19417	-0.00428		0.80319	0.00834	
2011	5	0.61012	0.19417	-0.00428		0.80001	-0.00318	
2011	6	0.60734	0.19417	-0.00428		0.79723	-0.00278	
2011	7	0.60414	0.19417	-0.00428		0.79403	-0.00320	
2011	8	0.61333	0.19417	-0.00428		0.80322	0.00919	
2011	9	0.56851	0.19417	-0.01609		0.74659	-0.05663	
2011	10	0.54608	0.19417	-0.01609		0.72416	-0.02243	
2011	11	0.5966	0.19417	-0.01609		0.77468	0.05052	
2011	12	0.58007	0.19417	-0.01609		0.75815	-0.01653	
2012	1	0.56467	0.19417	-0.01609		0.74275	-0.01540	
2012	2	0.52995	0.19417	-0.01609		0.70803	-0.03472	
2012	3	0.5344	0.19417	-0.01609		0.71248	0.00445	
2012	4	0.51893	0.19417	-0.01609		0.69701	-0.01547	
2012	5	0.46855	0.19417	-0.01609		0.64663	-0.05038	
2012	6	0.45904	0.19417	-0.01609		0.63712	-0.00951	
2012	7	0.47173	0.19417	-0.01609		0.64981	0.01269	
2012	8	0.5087	0.19417	-0.01609		0.68678	0.03697	
2012	9	0.46959	0.19417	0.02602		0.68978	0.00300	
2012	10	0.4965	0.19417	0.02602		0.71669	0.02691	
2012	11	0.53469	0.19417	0.02602		0.75488	0.03819	
2012	12	0.5503	0.19417	0.02602		0.77049	0.01561	
2013	1	0.51287	0.19754	0.02602		0.73643	-0.03406	Final Rates per Docket No. G007,011/GR-10-977
2013	2	0.50785	0.19754	0.02602		0.73141	-0.00502	
2013	3	0.52124	0.19754	0.02602		0.74480	0.01339	
2013	4	0.56577	0.19754	0.02602		0.78933	0.04453	
2013	5	0.60472	0.19754	0.02602		0.82828	0.03895	
2013	6	0.60947	0.19754	0.02602		0.83303	0.00475	

Viking Residential

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2011	1	0.52445	0.17746	0.20306		0.90497		Final Rates per Docket No. G007,011/GR-08-836
2011	2	0.52275	0.19417	0.20306		0.91998	0.01501	Interim Rates per Docket No. G007,011/GR-10-977
2011	3	0.51315	0.19417	0.20306		0.91038	-0.00960	
2011	4	0.50728	0.19417	0.20306		0.90451	-0.00587	
2011	5	0.52233	0.19417	0.20306		0.91956	0.01505	
2011	6	0.51753	0.19417	0.20306		0.91476	-0.00480	
2011	7	0.51662	0.19417	0.20306		0.91385	-0.00091	
2011	8	0.51659	0.19417	0.20306		0.91382	-0.00003	
2011	9	0.46953	0.19417	0.01253		0.67623	-0.23759	
2011	10	0.46334	0.19417	0.01253		0.67004	-0.00619	
2011	11	0.48621	0.19417	0.01253		0.69291	0.02287	
2011	12	0.4644	0.19417	0.01253		0.67110	-0.02181	
2012	1	0.46355	0.19417	0.01253		0.67025	-0.00085	
2012	2	0.43105	0.19417	0.01253		0.63775	-0.03250	
2012	3	0.43226	0.19417	0.01253		0.63896	0.00121	
2012	4	0.38021	0.19417	0.01253		0.58691	-0.05205	
2012	5	0.29945	0.19417	0.01253		0.50615	-0.08076	
2012	6	0.33517	0.19417	0.01253		0.54187	0.03572	
2012	7	0.36502	0.19417	0.01253		0.57172	0.02985	
2012	8	0.39395	0.19417	0.01253		0.60065	0.02893	
2012	9	0.36502	0.19417	-0.00344		0.55575	-0.04490	
2012	10	0.40817	0.19417	-0.00344		0.59890	0.04315	
2012	11	0.40874	0.19417	-0.00344		0.59947	0.00057	
2012	12	0.40857	0.19417	-0.00344		0.59930	-0.00017	
2013	1	0.41512	0.19754	-0.00344		0.60922	0.00992	Final Rates per Docket No. G007,011/GR-10-977
2013	2	0.40918	0.19754	-0.00344		0.60328	-0.00594	
2013	3	0.42975	0.19754	-0.00344		0.62385	0.02057	
2013	4	0.44931	0.19754	-0.00344		0.64341	0.01956	
2013	5	0.51036	0.19754	-0.00344		0.70446	0.06105	
2013	6	0.50946	0.19754	-0.00344		0.70356	-0.00090	

Great Lakes Residential

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2011	1	0.51121	0.17746	0.14934		0.83801		Final Rates per Docket No. G007,011/GR-08-836
2011	2	0.5091	0.19417	0.14934		0.85261	0.01460	Interim Rates per Docket No. G007,011/GR-10-977
2011	3	0.50022	0.19417	0.14934		0.84373	-0.00888	
2011	4	0.49917	0.19417	0.14934		0.84268	-0.00105	
2011	5	0.514	0.19417	0.14934		0.85751	0.01483	
2011	6	0.50902	0.19417	0.14934		0.85253	-0.00498	
2011	7	0.50797	0.19417	0.14934		0.85148	-0.00105	
2011	8	0.5078	0.19417	0.14934		0.85131	-0.00017	
2011	9	0.46098	0.19417	0.02222		0.67737	-0.17394	
2011	10	0.44674	0.19417	0.02222		0.66313	-0.01424	
2011	11	0.46845	0.19417	0.02222		0.68484	0.02171	
2011	12	0.44711	0.19417	0.02222		0.66350	-0.02134	
2012	1	0.44613	0.19417	0.02222		0.66252	-0.00098	
2012	2	0.41409	0.19417	0.02222		0.63048	-0.03204	
2012	3	0.41533	0.19417	0.02222		0.63172	0.00124	
2012	4	0.36725	0.19417	0.02222		0.58364	-0.04808	
2012	5	0.28703	0.19417	0.02222		0.50342	-0.08022	
2012	6	0.32263	0.19417	0.02222		0.53902	0.03560	
2012	7	0.35229	0.19417	0.02222		0.56868	0.02966	
2012	8	0.38104	0.19417	0.02222		0.59743	0.02875	
2012	9	0.3523	0.19417	-0.00883		0.53764	-0.05979	
2012	10	0.39509	0.19417	-0.00883		0.58043	0.04279	
2012	11	0.40698	0.19417	-0.00883		0.59232	0.01189	
2012	12	0.40544	0.19417	-0.00883		0.59078	-0.00154	
2013	1	0.406	0.19754	-0.00883		0.59471	0.00393	Final Rates per Docket No. G007,011/GR-10-977
2013	2	0.40018	0.19754	-0.00883		0.58889	-0.00582	
2013	3	0.42071	0.19754	-0.00883		0.60942	0.02053	
2013	4	0.44326	0.19754	-0.00883		0.63197	0.02255	
2013	5	0.5047	0.19754	-0.00883		0.69341	0.06144	
2013	6	0.50674	0.19754	-0.00883		0.69545	0.00204	

NMU Residential

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2011	1	0.56243	0.21759	0.00679		0.78681		Final Rates per Docket No. G007,011/GR-08-836
2011	2	0.56379	0.24189	0.00679		0.81247	0.02566	Interim Rates per Docket No. G007,011/GR-10-977
2011	3	0.55312	0.24189	0.00679		0.80180	-0.01067	
2011	4	0.5536	0.24189	0.00679		0.80228	0.00048	
2011	5	0.56176	0.24189	0.00679		0.81044	0.00816	
2011	6	0.55741	0.24189	0.00679		0.80609	-0.00435	
2011	7	0.55563	0.24189	0.00679		0.80431	-0.00178	
2011	8	0.55905	0.24189	0.00679		0.80773	0.00342	
2011	9	0.51299	0.24189	-0.01096		0.74392	-0.06381	
2011	10	0.49179	0.24189	-0.01096		0.72272	-0.02120	
2011	11	0.53329	0.24189	-0.01096		0.76422	0.04150	
2011	12	0.51374	0.24189	-0.01096		0.74467	-0.01955	
2012	1	0.50747	0.24189	-0.01096		0.73840	-0.00627	
2012	2	0.47422	0.24189	-0.01096		0.70515	-0.03325	
2012	3	0.4766	0.24189	-0.01096		0.70753	0.00238	
2012	4	0.43686	0.24189	-0.01096		0.66779	-0.03974	
2012	5	0.36777	0.24189	-0.01096		0.59870	-0.06909	
2012	6	0.38641	0.24189	-0.01096		0.61734	0.01864	
2012	7	0.40973	0.24189	-0.01096		0.64066	0.02332	
2012	8	0.4416	0.24189	-0.01096		0.67253	0.03187	
2012	9	0.40895	0.24189	0.01007		0.66091	-0.01162	
2012	10	0.44586	0.24189	0.01007		0.69782	0.03691	
2012	11	0.47119	0.24189	0.01007		0.72315	0.02533	
2012	12	0.47647	0.24189	0.01007		0.72843	0.00528	
2013	1	0.47933	0.19754	0.01007		0.68694	-0.04149	Final Rates per Docket No. G007,011/GR-10-977
2013	2	0.47379	0.19754	0.01007		0.68140	-0.00554	
2013	3	0.49147	0.19754	0.01007		0.69908	0.01768	
2013	4	0.52209	0.19754	0.01007		0.72970	0.03062	
2013	5	0.57446	0.19754	0.01007		0.78207	0.05237	
2013	6	0.57653	0.19754	0.01007		0.78414	0.00207	

NNG Residential

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2013	7	0.55793	0.19754	0		0.75547		PGA Consolidation
2013	8	0.55893	0.19754	0		0.75647	0.00100	
2013	9	0.54309	0.19754	-0.0004		0.74023	-0.01624	
2013	10	0.5436	0.19754	-0.0004		0.74074	0.00051	
2013	11	0.57652	0.19754	-0.0004		0.77366	0.03292	
2013	12	0.57341	0.19754	-0.0004		0.77055	-0.00311	
2014	1	0.64087	0.2229	-0.0004		0.86337	0.09282	Docket No. G011/GR-13-617 Interim
2014	2	0.69713	0.2229	-0.0004		0.91963	0.05626	
2014	3	0.76961	0.2229	-0.0004		0.99211	0.07248	
2014	4	0.67256	0.2229	-0.0004	-0.01247	0.88259	-0.10952	Implementation of 2013 Decoupling
2014	5	0.67047	0.2229	-0.0004	-0.01247	0.88050	-0.00209	
2014	6	0.65261	0.2229	-0.0004	-0.01247	0.86264	-0.01786	
2014	7	0.6609	0.2229	-0.0004	-0.01247	0.87093	0.00829	
2014	8	0.58272	0.2229	-0.0004	-0.01247	0.79275	-0.07818	
2014	9	0.59865	0.2229	0.04714	-0.01247	0.85622	0.06347	
2014	10	0.5942	0.2229	0.04714	-0.01247	0.85177	-0.00445	
2014	11	0.60033	0.2229	0.04714	-0.01247	0.85790	0.00613	
2014	12	0.67574	0.2229	0.04714	-0.01247	0.93331	0.07541	
2015	1	0.57522	0.2229	0.04714	-0.01247	0.83279	-0.10052	
2015	2	0.58248	0.2229	0.04714	-0.01247	0.84005	0.00726	
2015	3	0.58694	0.2229	0.04714	-0.01247	0.84451	0.00446	
2015	4	0.51971	0.21806	0.04714	-0.01936	0.76555	-0.07896	Implementation of 2014 Decoupling
2015	5	0.46762	0.21806	0.04714	-0.01936	0.71346	-0.05209	
2015	6	0.47197	0.21806	0.04714	-0.01936	0.71781	0.00435	
2015	7	0.46367	0.21806	0.04714	-0.01936	0.70951	-0.00830	
2015	8	0.46357	0.21806	0.04714	-0.01936	0.70941	-0.00010	
2015	9	0.45141	0.21806	-0.01703	-0.01936	0.63308	-0.07633	
2015	10	0.44833	0.21806	-0.01703	-0.01936	0.63000	-0.00308	
2015	11	0.42882	0.21806	-0.01703	-0.01936	0.61049	-0.01951	
2015	12	0.43647	0.21806	-0.01703	-0.01936	0.61814	0.00765	
2016	1	0.43885	0.23980	-0.01703	-0.01936	0.64226	0.02412	Interim rate implementation
2016	2	0.43219	0.23980	-0.01703	-0.01936	0.63560	-0.00666	
2016	3	0.40042	0.23980	-0.01703	0.02022	0.64341	0.00781	Implementation of 2015 Decoupling
2016	4	0.38246	0.23980	-0.01703	0.02022	0.62545	-0.01796	
2016	5	0.44307	0.23980	-0.01703	0.02022	0.68606	0.06061	
2016	6	0.3096	0.23980	-0.01703	0.02022	0.55259	-0.13347	
2016	7	0.38224	0.23980	-0.01703	0.02022	0.62523	0.07264	
2016	8	0.38965	0.23980	-0.01703	0.02022	0.63264	0.00741	
2016	9	0.42577	0.23980	0.00000	0.02022	0.68579	0.05315	1 month delay in implementation of ACA factor
2016	10	0.4285	0.23980	0.00301	0.02022	0.69153	0.00574	
2016	11	0.40001	0.23980	0.00301	0.02022	0.66304	-0.02849	
2016	12	0.42918	0.23980	0.00301	0.02022	0.69221	0.02917	
2017	1	0.48683	0.23980	0.00301	0.02022	0.74986	0.05765	
2017	2	0.43831	0.23980	0.00301	0.02022	0.70134	-0.04852	
2017	3	0.39064	0.23980	0.00301	0.01761	0.65106	-0.05028	Implementation of 2016 Decoupling
2017	4	0.40083	0.24116	0.00301	0.01761	0.66261	0.01155	Implementation of Final Rates 15-763
2017	5	0.41038	0.24116	0.00301	0.01761	0.67216	0.00955	
2017	6	0.43273	0.24116	0.00301	0.01761	0.69451	0.02235	
2017	7	0.40626	0.24116	0.00301	0.01761	0.66804	-0.02647	
2017	8	0.40103	0.24116	0.00301	0.01761	0.66281	-0.00523	
2017	9	0.42288	0.24116	0.01072	0.01761	0.69237	0.02956	ACA Factor Implementation
2017	10	0.40034	0.24116	0.01072	0.01761	0.66983	-0.02254	
2017	11	0.41809	0.24116	0.01072	0.01761	0.68758	0.01775	
2017	12	0.43567	0.24116	0.01072	0.01761	0.70516	0.01758	
2018	1	0.43153	0.26284	0.01072	0.01761	0.72270	0.01754	Interim rate implementation
2018	2	0.54191	0.26284	0.01072	0.01761	0.83308	0.11038	
2018	3	0.40675	0.26284	0.01072	0.01643	0.69674	-0.13634	Implementation of 2017 Decoupling
2018	4	0.40035	0.25727	0.01072	0.01643	0.68477	-0.01197	Interim rate adjustment for TCJA
2018	5	0.41023	0.25727	0.01072	0.01643	0.69465	0.00988	
2018	6	0.40897	0.25727	0.01072	0.01643	0.69339	-0.00126	
2018	7	0.41573	0.25727	0.01072	0.01643	0.70015	0.00676	
2018	8	0.41291	0.25727	0.01072	0.01643	0.69733	-0.00282	
2018	9	0.41782	0.25727	0.02234	0.01643	0.71386	0.01653	ACA Factor Implementation
2018	10	0.44154	0.25727	0.02234	0.01643	0.73758	0.02372	
2018	11	0.4966	0.25727	0.02234	0.01643	0.79264	0.05506	
2018	12	0.57017	0.25727	0.02234	0.01643	0.86621	0.07357	
2019	1	0.54149	0.25727	0.02234	0.01643	0.83753	-0.02868	
2019	2	0.48729	0.25727	0.02234	0.01643	0.78333	-0.05420	
2019	3	0.45814	0.25727	0.02234	-0.01765	0.72010	-0.06323	Implementation of 2018 Decoupling
2019	4	0.46121	0.25727	0.02234	-0.01765	0.72317	0.00307	
2019	5	0.41681	0.25727	0.02234	-0.01765	0.67877	-0.04440	
2019	6	0.41668	0.25727	0.02234	-0.01765	0.67864	-0.00013	
2019	7	0.38712	0.24686	0.02234	-0.01765	0.63867	-0.03997	Implementation of Final Rates 17-563
2019	8	0.38975	0.24686	0.02234	-0.01765	0.64130	0.00263	
2019	9	0.38062	0.24686	-0.04127	-0.01765	0.56856	-0.07274	ACA Factor Implementation
2019	10	0.38706	0.24686	-0.04127	-0.01765	0.57500	0.00644	
2019	11	0.45884	0.24686	-0.04127	-0.01765	0.64678	0.07178	
2019	12	0.46457	0.24686	-0.04127	-0.01765	0.65251	0.00573	

Consolidated Residential

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2013	7	0.47661	0.19754	0.00000		0.67415		PGA Consolidation
2013	8	0.47303	0.19754	0.00000		0.67057	-0.00358	
2013	9	0.47474	0.19754	-0.03086		0.64142	-0.02915	
2013	10	0.47846	0.19754	-0.03086		0.64514	0.00372	
2013	11	0.46712	0.19754	-0.03086		0.63380	-0.01134	
2013	12	0.49062	0.19754	-0.03086		0.65730	0.02350	
2014	1	0.51386	0.22290	-0.03086		0.70590	0.04860	Docket No. G011/GR-13-617 Interim
2014	2	0.65193	0.22290	-0.03086		0.84397	0.13807	
2014	3	0.74803	0.22290	-0.03086		0.94007	0.09610	
2014	4	0.58207	0.22290	-0.03086	-0.01247	0.76164	-0.17843	Implementation of 2013 Decoupling
2014	5	0.58739	0.22290	-0.03086	-0.01247	0.76696	0.00532	
2014	6	0.55646	0.22290	-0.03086	-0.01247	0.73603	-0.03093	
2014	7	0.55334	0.22290	-0.03086	-0.01247	0.73291	-0.00312	
2014	8	0.48847	0.22290	-0.03086	-0.01247	0.66804	-0.06487	
2014	9	0.50302	0.22290	0.08726	-0.01247	0.80071	0.13267	
2014	10	0.51296	0.22290	0.08726	-0.01247	0.81065	0.00994	
2014	11	0.57338	0.22290	0.08726	-0.01247	0.87107	0.06042	
2014	12	0.5952	0.22290	0.08726	-0.01247	0.89289	0.02182	
2015	1	0.52515	0.2229	0.08726	-0.01247	0.82284	-0.07005	
2015	2	0.47522	0.2229	0.08726	-0.01247	0.77291	-0.04993	
2015	3	0.52264	0.2229	0.08726	-0.01936	0.81344	0.04053	
2015	4	0.43212	0.21806	0.08726	-0.01936	0.71808	-0.09536	Implementation of 2014 Decoupling
2015	5	0.38945	0.21806	0.08726	-0.01936	0.67541	-0.04267	
2015	6	0.40675	0.21806	0.08726	-0.01936	0.69271	0.01730	
2015	7	0.39624	0.21806	0.08726	-0.01936	0.68220	-0.01051	
2015	8	0.40609	0.21806	0.08726	-0.01936	0.69205	0.00985	
2015	9	0.39881	0.21806	0.01468	-0.01936	0.61219	-0.07986	
2015	10	0.39916	0.21806	0.01468	-0.01936	0.61254	0.00035	
2015	11	0.393	0.21806	0.01468	-0.01936	0.60638	-0.00616	
2015	12	0.38818	0.21806	0.01468	-0.01936	0.60156	-0.00482	
2016	1	0.3959	0.23980	0.01468	-0.01936	0.63102	0.02946	Interim rate implementation
2016	2	0.38753	0.23980	0.01468	-0.01936	0.62265	-0.00837	
2016	3	0.37177	0.23980	0.01468	0.02022	0.64647	0.02382	Implementation of 2015 Decoupling
2016	4	0.31489	0.23980	0.01468	0.02022	0.58959	-0.05688	
2016	5	0.29986	0.23980	0.01468	0.02022	0.57456	-0.01503	
2016	6	0.29546	0.23980	0.01468	0.02022	0.57016	-0.00440	
2016	7	0.39067	0.23980	0.01468	0.02022	0.66537	0.09521	
2016	8	0.34783	0.23980	0.01468	0.02022	0.62253	-0.04284	
2016	9	0.38356	0.23980	0.00000	0.02022	0.64358	0.02105	1 month delay in implementation of ACA factor
2016	10	0.39548	0.23980	-0.00355	0.02022	0.65195	0.00837	
2016	11	0.37388	0.23980	-0.00355	0.02022	0.63035	-0.02160	
2016	12	0.38569	0.23980	-0.00355	0.02022	0.64216	0.01181	
2017	1	0.42216	0.23980	-0.00355	0.02022	0.67863	0.03647	
2017	2	0.39641	0.23980	-0.00355	0.02022	0.65288	-0.02575	
2017	3	0.37644	0.23980	-0.00355	0.01761	0.63030	-0.02258	Implementation of 2016 Decoupling
2017	4	0.36905	0.24116	-0.00355	0.01761	0.62427	-0.00603	Implementation of Final Rates 15-763
2017	5	0.37369	0.24116	-0.00355	0.01761	0.62891	0.00464	
2017	6	0.38179	0.24116	-0.00355	0.01761	0.63701	0.00810	
2017	7	0.36668	0.24116	-0.00355	0.01761	0.62190	-0.01511	
2017	8	0.35905	0.24116	-0.00355	0.01761	0.61427	-0.00763	
2017	9	0.36078	0.24116	-0.00711	0.01761	0.61244	-0.00183	ACA Factor Implementation
2017	10	0.35919	0.24116	-0.00711	0.01761	0.61085	-0.00159	
2017	11	0.33682	0.24116	-0.00711	0.01761	0.58848	-0.02237	
2017	12	0.30692	0.24116	-0.00711	0.01761	0.55858	-0.02990	
2018	1	0.2885	0.26284	-0.00711	0.01761	0.56184	0.00326	Interim rate implementation
2018	2	0.34728	0.26284	-0.00711	0.01761	0.62062	0.05878	
2018	3	0.33935	0.26284	-0.00711	0.01643	0.61151	-0.00911	Implementation of 2017 Decoupling
2018	4	0.32916	0.25727	-0.00711	0.01643	0.59575	-0.01576	Interim rate adjustment for TCJA
2018	5	0.34125	0.25727	-0.00711	0.01643	0.60784	0.01209	
2018	6	0.34042	0.25727	-0.00711	0.01643	0.60701	-0.00083	
2018	7	0.35545	0.25727	-0.00711	0.01643	0.62204	0.01503	
2018	8	0.36852	0.25727	-0.00711	0.01643	0.63511	0.01307	
2018	9	0.37098	0.25727	0.02053	0.01643	0.66521	0.03010	ACA Factor Implementation
2018	10	0.3743	0.25727	0.02053	0.01643	0.66853	0.00332	
2018	11	0.39789	0.25727	0.02053	0.01643	0.69212	0.02359	
2018	12	0.49515	0.25727	0.02053	0.01643	0.78938	0.09726	
2019	1	0.43899	0.25727	0.02053	0.01643	0.73322	-0.05616	
2019	2	0.3903	0.25727	0.02053	0.01643	0.68453	-0.04869	
2019	3	0.37846	0.25727	0.02053	-0.01765	0.63861	-0.04592	Implementation of 2018 Decoupling
2019	4	0.3469	0.25727	0.02053	-0.01765	0.60705	-0.03156	
2019	5	0.32806	0.25727	0.02053	-0.01765	0.58821	-0.01884	
2019	6	0.32987	0.25727	0.02053	-0.01765	0.59002	0.00181	
2019	7	0.30516	0.24686	0.02053	-0.01765	0.55490	-0.03512	Implementation of Final Rates 17-563
2019	8	0.28252	0.24686	0.02053	-0.01765	0.53226	-0.02264	
2019	9	0.2989	0.24686	-0.02915	-0.01765	0.49896	-0.03330	ACA Factor Implementation
2019	10	0.29916	0.24686	-0.02915	-0.01765	0.49922	0.00026	
2019	11	0.36067	0.24686	-0.02915	-0.01765	0.56073	0.06151	
2019	12	0.359847	0.24686	-0.02915	-0.01765	0.55991	-0.00082	

Albert Lea Residential

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2013	7					0.00000		
2013	8					0.00000	0.00000	
2013	9					0.00000	0.00000	
2013	10					0.00000	0.00000	
2013	11					0.00000	0.00000	
2013	12					0.00000	0.00000	
2014	1					0.00000	0.00000	
2014	2					0.00000	0.00000	
2014	3					0.00000	0.00000	
2014	4					0.00000	0.00000	
2014	5					0.00000	0.00000	
2014	6					0.00000	0.00000	
2014	7					0.00000	0.00000	
2014	8					0.00000	0.00000	
2014	9					0.00000	0.00000	
2014	10					0.00000	0.00000	
2014	11					0.00000	0.00000	
2014	12					0.00000	0.00000	
2015	1					0.00000	0.00000	
2015	2					0.00000	0.00000	
2015	3					0.00000	0.00000	
2015	4					0.00000	0.00000	Acquisition of MERC-AL customers from IPL Docket No PA-14-107
2015	5	0.3932	0.21806	0	0.00000	0.61126	0.61126	
2015	6	0.42673	0.21806	0	0.00000	0.64479	0.03353	
2015	7	0.41821	0.21806	0	0.00000	0.63627	-0.00852	
2015	8	0.42253	0.21806	0	0.00000	0.64059	0.00432	
2015	9	0.4165	0.21806	-0.00054	0.00000	0.63402	-0.00657	
2015	10	0.41205	0.21806	-0.00054	0.00000	0.62957	-0.00445	
2015	11	0.37257	0.21806	-0.00054	0.00000	0.59009	-0.03948	
2015	12	0.38323	0.21806	-0.00054	0.00000	0.60075	0.01066	
2016	1	0.40102	0.23980	-0.00054	0.00000	0.64028	0.03953	Interim rate implementation
2016	2	0.38964	0.23980	-0.00054	0.00000	0.62890	-0.01138	
2016	3	0.36288	0.23980	-0.00054	0.02022	0.62236	-0.00654	Implementation of 2015 Decoupling
2016	4	0.33509	0.23980	-0.00054	0.02022	0.59457	-0.02779	
2016	5	0.39574	0.23980	-0.00054	0.02022	0.65522	0.06065	
2016	6	0.32027	0.23980	-0.00054	0.02022	0.57975	-0.07547	
2016	7	0.39804	0.23980	-0.00054	0.02022	0.65752	0.07777	
2016	8	0.3928	0.23980	-0.00054	0.02022	0.65228	-0.00524	
2016	9	0.4065	0.23980	0.00000	0.02022	0.66652	0.01424	1 month delay in implementation of ACA factor
2016	10	0.42055	0.23980	0.01256	0.02022	0.69313	0.02661	
2016	11	0.40769	0.23980	0.01256	0.02022	0.68027	-0.01286	
2016	12	0.4324	0.23980	0.01256	0.02022	0.70498	0.02471	
2017	1	0.47454	0.23980	0.01256	0.02022	0.74712	0.04214	
2017	2	0.4444	0.23980	0.01256	0.02022	0.71698	-0.03014	
2017	3	0.40055	0.23980	0.01256	0.01761	0.67052	-0.04646	Implementation of 2016 Decoupling
2017	4	0.41009	0.24116	0.01256	0.01761	0.68142	0.01090	Implementation of Final Rates 15-763
2017	5	0.40966	0.24116	0.01256	0.01761	0.68099	-0.00043	
2017	6	0.42416	0.24116	0.01256	0.01761	0.69549	0.01450	
2017	7	0.41947	0.24116	0.01256	0.01761	0.69080	-0.00469	
2017	8	0.41424	0.24116	0.01256	0.01761	0.68557	-0.00523	
2017	9	0.44564	0.24116	0.01072	0.01761	0.71513	0.02956	ACA Factor Implementation
2017	10	0.4231	0.24116	0.01072	0.01761	0.69259	-0.02254	
2017	11	0.44085	0.24116	0.01072	0.01761	0.71034	0.01775	
2017	12	0.45843	0.24116	0.01072	0.01761	0.72792	0.01758	
2018	1	0.43153	0.26284	0.01072	0.01761	0.72270	-0.00522	Interim rate implementation
2018	2	0.54191	0.26284	0.01072	0.01761	0.83308	0.11038	
2018	3	0.40675	0.26284	0.01072	0.01643	0.69674	-0.13634	Implementation of 2017 Decoupling
2018	4	0.40035	0.25727	0.01072	0.01643	0.68477	-0.01197	Interim rate adjustment for TCJA
2018	5	0.41023	0.25727	0.01072	0.01643	0.69465	0.00988	
2018	6	0.40897	0.25727	0.01072	0.01643	0.69339	-0.00126	
2018	7	0.41573	0.25727	0.01072	0.01643	0.70015	0.00676	
2018	8	0.41291	0.25727	0.01072	0.01643	0.69733	-0.00282	
2018	9	0.41782	0.25727	0.02234	0.01643	0.71386	0.01653	ACA Factor Implementation
2018	10	0.44154	0.25727	0.02234	0.01643	0.73758	0.02372	
2018	11	0.4966	0.25727	0.02234	0.01643	0.79264	0.05506	
2018	12	0.57017	0.25727	0.02234	0.01643	0.86621	0.07357	
2019	1	0.54149	0.25727	0.02234	0.01643	0.83753	-0.02868	
2019	2	0.48729	0.25727	0.02234	0.01643	0.78333	-0.05420	
2019	3	0.45814	0.25727	0.02234	-0.01765	0.72010	-0.06323	Implementation of 2018 Decoupling
2019	4	0.46121	0.25727	0.02234	-0.01765	0.72317	0.00307	
2019	5	0.41681	0.25727	0.02234	-0.01765	0.67877	-0.04440	
2019	6	0.41668	0.25727	0.02234	-0.01765	0.67864	-0.00013	
2019	7					0.00000	-0.67864	Implementation of Final Rates 17-563
2019	8							
2019	9							
2019	10							
2019	11							
2019	12							

NNG Small C&I

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2011	1	0.61103	0.15022	-0.00428		0.75697		Final Rates per Docket No. G007,011/GR-08-836
2011	2	0.61794	0.16437	-0.00428		0.77803	0.02106	Interim Rates per Docket No. G007,011/GR-10-977
2011	3	0.60496	0.16437	-0.00428		0.76505	-0.01298	
2011	4	0.6133	0.16437	-0.00428		0.77339	0.00834	
2011	5	0.61012	0.16437	-0.00428		0.77021	-0.00318	
2011	6	0.60734	0.16437	-0.00428		0.76743	-0.00278	
2011	7	0.60414	0.16437	-0.00428		0.76423	-0.00320	
2011	8	0.61333	0.16437	-0.00428		0.77342	0.00919	
2011	9	0.56851	0.16437	-0.01609		0.71679	-0.05663	
2011	10	0.54608	0.16437	-0.01609		0.69436	-0.02243	
2011	11	0.5966	0.16437	-0.01609		0.74488	0.05052	
2011	12	0.58007	0.16437	-0.01609		0.72835	-0.01653	
2012	1	0.56467	0.16437	-0.01609		0.71295	-0.01540	
2012	2	0.52995	0.16437	-0.01609		0.67823	-0.03472	
2012	3	0.5344	0.16437	-0.01609		0.68268	0.00445	
2012	4	0.51893	0.16437	-0.01609		0.66721	-0.01547	
2012	5	0.46855	0.16437	-0.01609		0.61683	-0.05038	
2012	6	0.45904	0.16437	-0.01609		0.60732	-0.00951	
2012	7	0.47173	0.16437	-0.01609		0.62001	0.01269	
2012	8	0.5087	0.16437	-0.01609		0.65698	0.03697	
2012	9	0.46959	0.16437	0.02602		0.65998	0.00300	
2012	10	0.4965	0.16437	0.02602		0.68689	0.02691	
2012	11	0.53469	0.16437	0.02602		0.72508	0.03819	
2012	12	0.5503	0.16437	0.02602		0.74069	0.01561	
2013	1	0.51287	0.18525	0.02602		0.72414	-0.01655	Final Rates per Docket No. G007,011/GR-10-977
2013	2	0.50785	0.18525	0.02602		0.71912	-0.00502	
2013	3	0.52124	0.18525	0.02602		0.73251	0.01339	
2013	4	0.56577	0.18525	0.02602		0.77704	0.04453	
2013	5	0.60472	0.18525	0.02602		0.81599	0.03895	
2013	6	0.60947	0.18525	0.02602		0.82074	0.00475	

Viking Small C&I

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2011	1	0.52445	0.15022	0.20306		0.87773		Final Rates per Docket No. G007,011/GR-08-836
2011	2	0.52275	0.16437	0.20306		0.89018	0.01245	Interim Rates per Docket No. G007,011/GR-10-977
2011	3	0.51315	0.16437	0.20306		0.88058	-0.00960	
2011	4	0.50728	0.16437	0.20306		0.87471	-0.00587	
2011	5	0.52233	0.16437	0.20306		0.88976	0.01505	
2011	6	0.51753	0.16437	0.20306		0.88496	-0.00480	
2011	7	0.51662	0.16437	0.20306		0.88405	-0.00091	
2011	8	0.51659	0.16437	0.20306		0.88402	-0.00003	
2011	9	0.46953	0.16437	0.01253		0.64643	-0.23759	
2011	10	0.46334	0.16437	0.01253		0.64024	-0.00619	
2011	11	0.48621	0.16437	0.01253		0.66311	0.02287	
2011	12	0.4644	0.16437	0.01253		0.64130	-0.02181	
2012	1	0.46355	0.16437	0.01253		0.64045	-0.00085	
2012	2	0.43105	0.16437	0.01253		0.60795	-0.03250	
2012	3	0.43226	0.16437	0.01253		0.60916	0.00121	
2012	4	0.38021	0.16437	0.01253		0.55711	-0.05205	
2012	5	0.29945	0.16437	0.01253		0.47635	-0.08076	
2012	6	0.33517	0.16437	0.01253		0.51207	0.03572	
2012	7	0.36502	0.16437	0.01253		0.54192	0.02985	
2012	8	0.39395	0.16437	0.01253		0.57085	0.02893	
2012	9	0.36502	0.16437	-0.00344		0.52595	-0.04490	
2012	10	0.40817	0.16437	-0.00344		0.56910	0.04315	
2012	11	0.40874	0.16437	-0.00344		0.56967	0.00057	
2012	12	0.40857	0.16437	-0.00344		0.56950	-0.00017	
2013	1	0.41512	0.18525	-0.00344		0.59693	0.02743	Final Rates per Docket No. G007,011/GR-10-977
2013	2	0.40918	0.18525	-0.00344		0.59099	-0.00594	
2013	3	0.42975	0.18525	-0.00344		0.61156	0.02057	
2013	4	0.44931	0.18525	-0.00344		0.63112	0.01956	
2013	5	0.51036	0.18525	-0.00344		0.69217	0.06105	
2013	6	0.50946	0.18525	-0.00344		0.69127	-0.00090	

Great Lakes Small C&I

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2011	1	0.51121	0.15022	0.14934		0.81077		Final Rates per Docket No. G007,011/GR-08-836
2011	2	0.5091	0.16437	0.14934		0.82281	0.01204	Interim Rates per Docket No. G007,011/GR-10-977
2011	3	0.50022	0.16437	0.14934		0.81393	-0.00888	
2011	4	0.49917	0.16437	0.14934		0.81288	-0.00105	
2011	5	0.514	0.16437	0.14934		0.82771	0.01483	
2011	6	0.50902	0.16437	0.14934		0.82273	-0.00498	
2011	7	0.50797	0.16437	0.14934		0.82168	-0.00105	
2011	8	0.5078	0.16437	0.14934		0.82151	-0.00017	
2011	9	0.46098	0.16437	0.02222		0.64757	-0.17394	
2011	10	0.44674	0.16437	0.02222		0.63333	-0.01424	
2011	11	0.46845	0.16437	0.02222		0.65504	0.02171	
2011	12	0.44711	0.16437	0.02222		0.63370	-0.02134	
2012	1	0.44613	0.16437	0.02222		0.63272	-0.00098	
2012	2	0.41409	0.16437	0.02222		0.60068	-0.03204	
2012	3	0.41533	0.16437	0.02222		0.60192	0.00124	
2012	4	0.36725	0.16437	0.02222		0.55384	-0.04808	
2012	5	0.28703	0.16437	0.02222		0.47362	-0.08022	
2012	6	0.32263	0.16437	0.02222		0.50922	0.03560	
2012	7	0.35229	0.16437	0.02222		0.53888	0.02966	
2012	8	0.38104	0.16437	0.02222		0.56763	0.02875	
2012	9	0.3523	0.16437	-0.00883		0.50784	-0.05979	
2012	10	0.39509	0.16437	-0.00883		0.55063	0.04279	
2012	11	0.40698	0.16437	-0.00883		0.56252	0.01189	
2012	12	0.40544	0.16437	-0.00883		0.56098	-0.00154	
2013	1	0.406	0.18525	-0.00883		0.58242	0.02144	Final Rates per Docket No. G007,011/GR-10-977
2013	2	0.40018	0.18525	-0.00883		0.57660	-0.00582	
2013	3	0.42071	0.18525	-0.00883		0.59713	0.02053	
2013	4	0.44326	0.18525	-0.00883		0.61968	0.02255	
2013	5	0.5047	0.18525	-0.00883		0.68112	0.06144	
2013	6	0.50674	0.18525	-0.00883		0.68316	0.00204	

NMU Small C&I

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2011	1	0.56243	0.18564	0.00679		0.75486		Final Rates per Docket No. G007,011/GR-08-836
2011	2	0.56379	0.20637	0.00679		0.77695	0.02209	Interim Rates per Docket No. G007,011/GR-10-977
2011	3	0.55312	0.20637	0.00679		0.76628	-0.01067	
2011	4	0.5536	0.20637	0.00679		0.76676	0.00048	
2011	5	0.56176	0.20637	0.00679		0.77492	0.00816	
2011	6	0.55741	0.20637	0.00679		0.77057	-0.00435	
2011	7	0.55563	0.20637	0.00679		0.76879	-0.00178	
2011	8	0.55905	0.20637	0.00679		0.77221	0.00342	
2011	9	0.51299	0.20637	-0.01096		0.70840	-0.06381	
2011	10	0.49179	0.20637	-0.01096		0.68720	-0.02120	
2011	11	0.53329	0.20637	-0.01096		0.72870	0.04150	
2011	12	0.51374	0.20637	-0.01096		0.70915	-0.01955	
2012	1	0.50747	0.20637	-0.01096		0.70288	-0.00627	
2012	2	0.47422	0.20637	-0.01096		0.66963	-0.03325	
2012	3	0.4766	0.20637	-0.01096		0.67201	0.00238	
2012	4	0.43686	0.20637	-0.01096		0.63227	-0.03974	
2012	5	0.36777	0.20637	-0.01096		0.56318	-0.06909	
2012	6	0.38641	0.20637	-0.01096		0.58182	0.01864	
2012	7	0.40973	0.20637	-0.01096		0.60514	0.02332	
2012	8	0.4416	0.20637	-0.01096		0.63701	0.03187	
2012	9	0.40895	0.20637	0.01007		0.62539	-0.01162	
2012	10	0.44586	0.20637	0.01007		0.66230	0.03691	
2012	11	0.47119	0.20637	0.01007		0.68763	0.02533	
2012	12	0.47647	0.20637	0.01007		0.69291	0.00528	
2013	1	0.47933	0.18525	0.01007		0.67465	-0.01826	Final Rates per Docket No. G007,011/GR-10-977
2013	2	0.47379	0.18525	0.01007		0.66911	-0.00554	
2013	3	0.49147	0.18525	0.01007		0.68679	0.01768	
2013	4	0.52209	0.18525	0.01007		0.71741	0.03062	
2013	5	0.57446	0.18525	0.01007		0.76978	0.05237	
2013	6	0.57653	0.18525	0.01007		0.77185	0.00207	

NNG Small C&I

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2013	7	0.55793	0.18525	0		0.74318		PGA Consolidation
2013	8	0.55893	0.18525	0		0.74418	0.00100	
2013	9	0.54309	0.18525	-0.0004		0.72794	-0.01624	
2013	10	0.54360	0.18525	-0.0004		0.72845	0.00051	
2013	11	0.57652	0.18525	-0.0004		0.76137	0.03292	
2013	12	0.57341	0.18525	-0.0004		0.75826	-0.00311	
2014	1	0.64087	0.20904	-0.0004		0.84951	0.09125	Docket No. G011/GR-13-617 Interim
2014	2	0.69713	0.20904	-0.0004		0.90577	0.05626	
2014	3	0.76961	0.20904	-0.0004		0.97825	0.07248	
2014	4	0.67256	0.20904	-0.0004	-0.01701	0.86419	-0.11406	Implementation of 2013 Decoupling
2014	5	0.67047	0.20904	-0.0004	-0.01701	0.86210	-0.00209	
2014	6	0.65261	0.20904	-0.0004	-0.01701	0.84424	-0.01786	
2014	7	0.66090	0.20904	-0.0004	-0.01701	0.85253	0.00829	
2014	8	0.58272	0.20904	-0.0004	-0.01701	0.77435	-0.07818	
2014	9	0.59865	0.20904	0.04714	-0.01701	0.83782	0.06347	
2014	10	0.59420	0.20904	0.04714	-0.01701	0.83337	-0.00445	
2014	11	0.60033	0.20904	0.04714	-0.01701	0.83950	0.00613	
2014	12	0.67574	0.20904	0.04714	-0.01701	0.91491	0.07541	
2015	1	0.57522	0.20904	0.04714	-0.01701	0.81439	-0.10052	
2015	2	0.58248	0.20904	0.04714	-0.01701	0.82165	0.00726	
2015	3	0.58694	0.20904	0.04714	-0.01701	0.82611	0.00446	
2015	4	0.51971	0.18116	0.04714	-0.01567	0.73234	-0.09377	Implementation of 2014 Decoupling
2015	5	0.46762	0.18116	0.04714	-0.01567	0.68025	-0.05209	
2015	6	0.47197	0.18116	0.04714	-0.01567	0.68460	0.00435	
2015	7	0.46367	0.18116	0.04714	-0.01567	0.67630	-0.00830	
2015	8	0.46357	0.18116	0.04714	-0.01567	0.67620	-0.00010	
2015	9	0.45141	0.18116	-0.01703	-0.01567	0.59987	-0.07633	
2015	10	0.44833	0.18116	-0.01703	-0.01567	0.59679	-0.00308	
2015	11	0.42882	0.18116	-0.01703	-0.01567	0.57728	-0.01951	
2015	12	0.43647	0.18116	-0.01703	-0.01567	0.58493	0.00765	
2016	1	0.43885	0.19922	-0.01703	-0.01567	0.60537	0.02044	Interim rate implementation
2016	2	0.43219	0.19922	-0.01703	-0.01567	0.59871	-0.00666	
2016	3	0.40042	0.19922	-0.01703	0.01234	0.59495	-0.00376	Implementation of 2015 Decoupling
2016	4	0.38246	0.19922	-0.01703	0.01234	0.57699	-0.01796	
2016	5	0.44307	0.19922	-0.01703	0.01234	0.63760	0.06061	
2016	6	0.30960	0.19922	-0.01703	0.01234	0.50413	-0.13347	
2016	7	0.38224	0.19922	-0.01703	0.01234	0.57677	0.07264	
2016	8	0.38965	0.19922	-0.01703	0.01234	0.58418	0.00741	
2016	9	0.42577	0.19922	0.00000	0.01234	0.63733	0.05315	1 month delay in implementation of ACA factor
2016	10	0.42850	0.19922	0.00301	0.01234	0.64307	0.00574	
2016	11	0.40001	0.19922	0.00301	0.01234	0.61458	-0.02849	
2016	12	0.42918	0.19922	0.00301	0.01234	0.64375	0.02917	
2017	1	0.48683	0.19922	0.00301	0.01234	0.70140	0.05765	
2017	2	0.43831	0.19922	0.00301	0.01234	0.65288	-0.04852	
2017	3	0.39064	0.19922	0.00301	0.01384	0.60671	-0.04617	Implementation of 2016 Decoupling
2017	4	0.40083	0.22065	0.00301	0.01384	0.63833	0.03162	Implementation of Final Rates 15-763
2017	5	0.41038	0.22065	0.00301	0.01384	0.64788	0.00955	
2017	6	0.43273	0.22065	0.00301	0.01384	0.67023	0.02235	
2017	7	0.40626	0.22065	0.00301	0.01384	0.64376	-0.02647	
2017	8	0.40103	0.22065	0.00301	0.01384	0.63853	-0.00523	
2017	9	0.42288	0.22065	0.01072	0.01384	0.66809	0.02956	ACA Factor Implementation
2017	10	0.40034	0.22065	0.01072	0.01384	0.64555	-0.02254	
2017	11	0.41809	0.22065	0.01072	0.01384	0.66330	0.01775	
2017	12	0.43567	0.22065	0.01072	0.01384	0.68088	0.01758	
2018	1	0.43153	0.24049	0.01072	0.01384	0.69658	0.01570	Interim rate implementation
2018	2	0.54191	0.24049	0.01072	0.01384	0.80696	0.11038	
2018	3	0.40675	0.24049	0.01072	0.01774	0.67570	-0.13126	Implementation of 2017 Decoupling
2018	4	0.40035	0.23539	0.01072	0.01774	0.66420	-0.01150	Interim rate adjustment for TCJA
2018	5	0.41023	0.23539	0.01072	0.01774	0.67408	0.00988	
2018	6	0.40897	0.23539	0.01072	0.01774	0.67282	-0.00126	
2018	7	0.41573	0.23539	0.01072	0.01774	0.67958	0.00676	
2018	8	0.41291	0.23539	0.01072	0.01774	0.67676	-0.00282	
2018	9	0.41782	0.23539	0.02234	0.01774	0.69329	0.01653	ACA Factor Implementation
2018	10	0.44154	0.23539	0.02234	0.01774	0.71701	0.02372	
2018	11	0.4966	0.23539	0.02234	0.01774	0.77207	0.05506	
2018	12	0.57017	0.23539	0.02234	0.01774	0.84564	0.07357	
2019	1	0.54149	0.23539	0.02234	0.01774	0.81696	-0.02868	
2019	2	0.48729	0.23539	0.02234	0.01774	0.76276	-0.05420	
2019	3	0.45814	0.23539	0.02234	0.00741	0.72328	-0.03948	Implementation of 2018 Decoupling
2019	4	0.46121	0.23539	0.02234	0.00741	0.72635	0.00307	
2019	5	0.41681	0.23539	0.02234	0.00741	0.68195	-0.04440	
2019	6	0.41668	0.23539	0.02234	0.00741	0.68182	-0.00013	
2019	7	0.38712	0.22251	0.02234	0.00741	0.63938	-0.04244	Implementation of Final Rates 17-563
2019	8	0.38975	0.22251	0.02234	0.00741	0.64201	0.00263	
2019	9	0.38062	0.22251	-0.04127	0.00741	0.56927	-0.07274	ACA Factor Implementation
2019	10	0.38706	0.22251	-0.04127	0.00741	0.57571	0.00644	
2019	11	0.45884	0.22251	-0.04127	0.00741	0.64749	0.07178	
2019	12	0.46457	0.22251	-0.04127	0.00741	0.65322	0.00573	

Consolidated Small C&I

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2013	7	0.47661	0.18525	0		0.66186		PGA Consolidation
2013	8	0.47303	0.18525	0		0.65828	-0.00358	
2013	9	0.47474	0.18525	-0.03086		0.62913	-0.02915	
2013	10	0.47846	0.18525	-0.03086		0.63285	0.00372	
2013	11	0.46712	0.18525	-0.03086		0.62151	-0.01134	
2013	12	0.49062	0.18525	-0.03086		0.64501	0.02350	
2014	1	0.51386	0.20904	-0.03086		0.69204	0.04703	Docket No. G011/GR-13-617 Interim
2014	2	0.65193	0.20904	-0.03086		0.83011	0.13807	
2014	3	0.74803	0.20904	-0.03086		0.92621	0.09610	
2014	4	0.58207	0.20904	-0.03086	-0.01701	0.74324	-0.18297	Implementation of 2013 Decoupling
2014	5	0.58739	0.20904	-0.03086	-0.01701	0.74856	0.00532	
2014	6	0.55646	0.20904	-0.03086	-0.01701	0.71763	-0.03093	
2014	7	0.55334	0.20904	-0.03086	-0.01701	0.71451	-0.00312	
2014	8	0.48847	0.20904	-0.03086	-0.01701	0.64964	-0.06487	
2014	9	0.50302	0.20904	0.08726	-0.01701	0.78231	0.13267	
2014	10	0.51296	0.20904	0.08726	-0.01701	0.79225	0.00994	
2014	11	0.57338	0.20904	0.08726	-0.01701	0.85267	0.06042	
2014	12	0.5952	0.20904	0.08726	-0.01701	0.87449	0.02182	
2015	1	0.52515	0.20904	0.08726	-0.01701	0.80444	-0.07005	
2015	2	0.47522	0.20904	0.08726	-0.01701	0.75451	-0.04993	
2015	3	0.52264	0.20904	0.08726	-0.01701	0.80193	0.04742	
2015	4	0.43212	0.18116	0.08726	-0.01567	0.68487	-0.11706	Implementation of 2014 Decoupling
2015	5	0.38945	0.18116	0.08726	-0.01567	0.64220	-0.04267	
2015	6	0.40675	0.18116	0.08726	-0.01567	0.65950	0.01730	
2015	7	0.39624	0.18116	0.08726	-0.01567	0.64899	-0.01051	
2015	8	0.40609	0.18116	0.08726	-0.01567	0.65884	0.00985	
2015	9	0.39881	0.18116	0.01468	-0.01567	0.57898	-0.07986	
2015	10	0.39916	0.18116	0.01468	-0.01567	0.57933	0.00035	
2015	11	0.393	0.18116	0.01468	-0.01567	0.57317	-0.00616	
2015	12	0.38818	0.18116	0.01468	-0.01567	0.56835	-0.00482	
2016	1	0.3959	0.19922	0.01468	-0.01567	0.59413	0.02578	Interim rate implementation
2016	2	0.38753	0.19922	0.01468	-0.01567	0.58576	-0.00837	
2016	3	0.37177	0.19922	0.01468	0.01234	0.59801	0.01225	Implementation of 2015 Decoupling
2016	4	0.31489	0.19922	0.01468	0.01234	0.54113	-0.05688	
2016	5	0.29986	0.19922	0.01468	0.01234	0.52610	-0.01503	
2016	6	0.29546	0.19922	0.01468	0.01234	0.52170	-0.00440	
2016	7	0.39067	0.19922	0.01468	0.01234	0.61691	0.09521	
2016	8	0.34783	0.19922	0.01468	0.01234	0.57407	-0.04284	
2016	9	0.38356	0.19922	0.00000	0.01234	0.59512	0.02105	1 month delay in implementation of ACA factor
2016	10	0.39548	0.19922	-0.00355	0.01234	0.60349	0.00837	
2016	11	0.37388	0.19922	-0.00355	0.01234	0.58189	-0.02160	
2016	12	0.38569	0.19922	-0.00355	0.01234	0.59370	0.01181	
2017	1	0.42216	0.19922	-0.00355	0.01234	0.63017	0.03647	
2017	2	0.39641	0.19922	-0.00355	0.01234	0.60442	-0.02575	
2017	3	0.37644	0.19922	-0.00355	0.01384	0.58595	-0.01847	Implementation of 2016 Decoupling
2017	4	0.36905	0.22065	-0.00355	0.01384	0.59999	0.01404	Implementation of Final Rates 15-763
2017	5	0.37369	0.22065	-0.00355	0.01384	0.60463	0.00464	
2017	6	0.38179	0.22065	-0.00355	0.01384	0.61273	0.00810	
2017	7	0.36668	0.22065	-0.00355	0.01384	0.59762	-0.01511	
2017	8	0.35905	0.22065	-0.00355	0.01384	0.58999	-0.00763	
2017	9	0.36078	0.22065	-0.00711	0.01384	0.58816	-0.00183	ACA Factor Implementation
2017	10	0.35919	0.22065	-0.00711	0.01384	0.58657	-0.00159	
2017	11	0.33682	0.22065	-0.00711	0.01384	0.56420	-0.02237	
2017	12	0.30692	0.22065	-0.00711	0.01384	0.53430	-0.02990	
2018	1	0.2885	0.24049	-0.00711	0.01384	0.53572	0.00142	Interim rate implementation
2018	2	0.34728	0.24049	-0.00711	0.01384	0.59450	0.05878	
2018	3	0.33935	0.24049	-0.00711	0.01774	0.59047	-0.00403	Implementation of 2017 Decoupling
2018	4	0.32916	0.23539	-0.00711	0.01774	0.57518	-0.01529	Interim rate adjustment for TCJA
2018	5	0.34125	0.23539	-0.00711	0.01774	0.58727	0.01209	
2018	6	0.34042	0.23539	-0.00711	0.01774	0.58644	-0.00083	
2018	7	0.35545	0.23539	-0.00711	0.01774	0.60147	0.01503	
2018	8	0.36852	0.23539	-0.00711	0.01774	0.61454	0.01307	
2018	9	0.37098	0.23539	0.02053	0.01774	0.64464	0.03010	ACA Factor Implementation
2018	10	0.3743	0.23539	0.02053	0.01774	0.64796	0.00332	
2018	11	0.39789	0.23539	0.02053	0.01774	0.67155	0.02359	
2018	12	0.49515	0.23539	0.02053	0.01774	0.76881	0.09726	
2019	1	0.43899	0.23539	0.02053	0.01774	0.71265	-0.05616	
2019	2	0.3903	0.23539	0.02053	0.01774	0.66396	-0.04869	
2019	3	0.37846	0.23539	0.02053	0.00741	0.64179	-0.02217	Implementation of 2018 Decoupling
2019	4	0.3469	0.23539	0.02053	0.00741	0.61023	-0.03156	
2019	5	0.32806	0.23539	0.02053	0.00741	0.59139	-0.01884	
2019	6	0.32987	0.23539	0.02053	0.00741	0.59320	0.00181	
2019	7	0.30516	0.22251	0.02053	0.00741	0.55561	-0.03759	Implementation of Final Rates 17-563
2019	8	0.28252	0.22251	0.02053	0.00741	0.53297	-0.02264	
2019	9	0.2989	0.22251	-0.02915	0.00741	0.49967	-0.03330	ACA Factor Implementation
2019	10	0.29916	0.22251	-0.02915	0.00741	0.49993	0.00026	
2019	11	0.36067	0.22251	-0.02915	0.00741	0.56144	0.06151	
2019	12	0.359847	0.22251	-0.02915	0.00741	0.56062	-0.00082	

Albert Lea Small C&I

Year	Month	GAS COSTS	DIST MARGIN	ACA Factor	Decoupling Factor	EFFECTIVE RATE	$/therm Change in Rate	Notes
2013	7					0.00000		
2013	8					0.00000	0.00000	
2013	9					0.00000	0.00000	
2013	10					0.00000	0.00000	
2013	11					0.00000	0.00000	
2013	12					0.00000	0.00000	
2014	1					0.00000	0.00000	
2014	2					0.00000	0.00000	
2014	3					0.00000	0.00000	
2014	4					0.00000	0.00000	
2014	5					0.00000	0.00000	
2014	6					0.00000	0.00000	
2014	7					0.00000	0.00000	
2014	8					0.00000	0.00000	
2014	9					0.00000	0.00000	
2014	10					0.00000	0.00000	
2014	11					0.00000	0.00000	
2014	12					0.00000	0.00000	
2015	1					0.00000	0.00000	
2015	2					0.00000	0.00000	
2015	3					0.00000	0.00000	
2015	4					0.00000	0.00000	Acquisition of MERC-AL customers from IPL Docket No PA-14-107
2015	5	0.39320	0.18116	0	0.00000	0.57436	0.57436	
2015	6	0.42673	0.18116	0	0.00000	0.60789	0.03353	
2015	7	0.41821	0.18116	0	0.00000	0.59937	-0.00852	
2015	8	0.42253	0.18116	0	0.00000	0.60369	0.00432	
2015	9	0.41650	0.18116	-0.00054	0.00000	0.59712	-0.00657	
2015	10	0.41205	0.18116	-0.00054	0.00000	0.59267	-0.00445	
2015	11	0.37257	0.18116	-0.00054	0.00000	0.55319	-0.03948	
2015	12	0.38323	0.18116	-0.00054	0.00000	0.56385	0.01066	
2016	1	0.40102	0.19922	-0.00054	0.00000	0.59970	0.03585	Interim rate implementation
2016	2	0.38964	0.19922	-0.00054	0.00000	0.58832	-0.01138	
2016	3	0.36288	0.19922	-0.00054	0.01234	0.57390	-0.01442	Implementation of 2015 Decoupling
2016	4	0.33509	0.19922	-0.00054	0.01234	0.54611	-0.02779	
2016	5	0.39574	0.19922	-0.00054	0.01234	0.60676	0.06065	
2016	6	0.32027	0.19922	-0.00054	0.01234	0.53129	-0.07547	
2016	7	0.39804	0.19922	-0.00054	0.01234	0.60906	0.07777	
2016	8	0.39280	0.19922	-0.00054	0.01234	0.60382	-0.00524	
2016	9	0.40650	0.19922	0.00000	0.01234	0.61806	0.01424	1 month delay in implementation of ACA factor
2016	10	0.42055	0.19922	0.01256	0.01234	0.64467	0.02661	
2016	11	0.40769	0.19922	0.01256	0.01234	0.63181	-0.01286	
2016	12	0.43240	0.19922	0.01256	0.01234	0.65652	0.02471	
2017	1	0.47454	0.19922	0.00301	0.01234	0.68911	0.03259	
2017	2	0.44440	0.19922	0.00301	0.01234	0.65897	-0.03014	
2017	3	0.40055	0.19922	0.00301	0.01384	0.61662	-0.04235	Implementation of 2016 Decoupling
2017	4	0.41009	0.22065	0.00301	0.01384	0.64759	0.03097	Implementation of Final Rates 15-763
2017	5	0.40966	0.22065	0.00301	0.01384	0.64716	-0.00043	
2017	6	0.42416	0.22065	0.00301	0.01384	0.66166	0.01450	
2017	7	0.41947	0.22065	0.00301	0.01384	0.65697	-0.00469	
2017	8	0.41424	0.22065	0.00301	0.01384	0.65174	-0.00523	
2017	9	0.44564	0.22065	0.01072	0.01384	0.69085	0.03911	ACA Factor Implementation
2017	10	0.42310	0.22065	0.01072	0.01384	0.66831	-0.02254	
2017	11	0.44085	0.22065	0.01072	0.01384	0.68606	0.01775	
2017	12	0.45843	0.22065	0.01072	0.01384	0.70364	0.01758	
2018	1	0.43153	0.24049	0.01072	0.01384	0.69658	-0.00706	Interim rate implementation
2018	2	0.54191	0.24049	0.01072	0.01384	0.80696	0.11038	
2018	3	0.40675	0.24049	0.01072	0.01774	0.67570	-0.13126	Implementation of 2017 Decoupling
2018	4	0.40035	0.23539	0.01072	0.01774	0.66420	-0.01150	Interim rate adjustment for TCJA
2018	5	0.41023	0.23539	0.01072	0.01774	0.67408	0.00988	
2018	6	0.40897	0.23539	0.01072	0.01774	0.67282	-0.00126	
2018	7	0.41573	0.23539	0.01072	0.01774	0.67958	0.00676	
2018	8	0.41291	0.23539	0.01072	0.01774	0.67676	-0.00282	
2018	9	0.41782	0.23539	0.02234	0.01774	0.69329	0.01653	ACA Factor Implementation
2018	10	0.44154	0.23539	0.02234	0.01774	0.71701	0.02372	
2018	11	0.4966	0.23539	0.02234	0.01774	0.77207	0.05506	
2018	12	0.57017	0.23539	0.02234	0.01774	0.84564	0.07357	
2019	1	0.54149	0.23539	0.02234	0.01774	0.81696	-0.02868	
2019	2	0.48729	0.23539	0.02234	0.01774	0.76276	-0.05420	
2019	3	0.45814	0.23539	0.02234	0.00741	0.72328	-0.03948	Implementation of 2018 Decoupling
2019	4	0.46121	0.23539	0.02234	0.00741	0.72635	0.00307	
2019	5	0.41681	0.23539	0.02234	0.00741	0.68195	-0.04440	
2019	6	0.41668	0.23539	0.02234	0.00741	0.68182	-0.00013	
2019	7					0.00000	-0.68182	Implementation of Final Rates 17-563
2019	8							
2019	9							
2019	10							
2019	11							
2019	12							

ATTACHMENT **B**

NNG Residential

Year	Month	GAS* COSTS	MARGIN REVENUE
2011	1	0.61103	$ 5,193,548
2011	2	0.61794	$ 4,714,185
2011	3	0.60496	$ 3,391,061
2011	4	0.6133	$ 1,911,850
2011	5	0.61012	$ 1,003,226
2011	6	0.60734	$ (19,554)
2011	7	0.60414	$ 278,402
2011	8	0.61333	$ 384,170
2011	9	0.56851	$ 463,786
2011	10	0.54608	$ 801,292
2011	11	0.5966	$ 1,880,409
2011	12	0.58007	$ 3,832,648
2012	1	0.56467	$ 4,163,182
2012	2	0.52995	$ 4,009,436
2012	3	0.5344	$ 2,789,361
2012	4	0.51893	$ 100,490
2012	5	0.46855	$ 939,924
2012	6	0.45904	$ 98,837
2012	7	0.47173	$ 377,511
2012	8	0.5087	$ 401,463
2012	9	0.46959	$ 451,711
2012	10	0.4965	$ 980,690
2012	11	0.53469	$ 2,261,933
2012	12	0.5503	$ 3,423,687
2013	1	0.51287	$ 4,515,141
2013	2	0.50785	$ 5,635,357
2013	3	0.52124	$ 3,824,256
2013	4	0.56577	$ 2,754,359
2013	5	0.60472	$ 1,500,597
2013	6	0.60947	$ (361,209)

Viking Residential

Year	Month	GAS* COSTS	MARGIN REVENUE
2011	1	0.52445	$ 134,582
2011	2	0.52275	$ 123,362
2011	3	0.51315	$ 96,217
2011	4	0.50728	$ 54,171
2011	5	0.52233	$ 21,786
2011	6	0.51753	$ (5,334)
2011	7	0.51662	$ 912
2011	8	0.51659	$ 5,451
2011	9	0.46953	$ 7,472
2011	10	0.46334	$ 23,885
2011	11	0.48621	$ 49,222
2011	12	0.4644	$ 108,474
2012	1	0.46355	$ 103,978
2012	2	0.43105	$ 113,431
2012	3	0.43226	$ 80,943
2012	4	0.38021	$ 9,607
2012	5	0.29945	$ 19,438
2012	6	0.33517	$ (1,951)
2012	7	0.36502	$ 4,524
2012	8	0.39395	$ 6,234
2012	9	0.36502	$ 7,389
2012	10	0.40817	$ 31,549
2012	11	0.40874	$ 67,797
2012	12	0.40857	$ 105,484
2013	1	0.41512	$ 120,158
2013	2	0.40918	$ 139,315
2013	3	0.42975	$ 113,693
2013	4	0.44931	$ 55,821
2013	5	0.51036	$ 71,303
2013	6	0.50946	$ (28,353)

Great Lakes Residential

Year	Month	GAS* COSTS	MARGIN REVENUE
2011	1	0.51121	$ 170,883
2011	2	0.5091	$ 149,564
2011	3	0.50022	$ 132,559
2011	4	0.49917	$ 65,641
2011	5	0.514	$ 23,478
2011	6	0.50902	$ (7,889)
2011	7	0.50797	$ (977)
2011	8	0.5078	$ 6,069
2011	9	0.46098	$ 9,096
2011	10	0.44674	$ 28,020
2011	11	0.46845	$ 70,029
2011	12	0.44711	$ 141,660
2012	1	0.44613	$ 134,147
2012	2	0.41409	$ 144,637
2012	3	0.41533	$ 98,805
2012	4	0.36725	$ 22,140
2012	5	0.28703	$ 29,307
2012	6	0.32263	$ (6,479)
2012	7	0.35229	$ 2,126
2012	8	0.38104	$ 5,795
2012	9	0.3523	$ 9,581
2012	10	0.39509	$ 42,624
2012	11	0.40698	$ 84,457
2012	12	0.40544	$ 138,870
2013	1	0.406	$ 163,646
2013	2	0.40018	$ 180,072
2013	3	0.42071	$ 118,950
2013	4	0.44326	$ 93,627
2013	5	0.5047	$ 81,538
2013	6	0.50674	$ (23,261)

NMU Residential

Year	Month	GAS* COSTS	MARGIN REVENUE
2011	1	0.56243	$ 1,476,451
2011	2	0.56379	$ 1,424,182
2011	3	0.55312	$ 1,051,814
2011	4	0.5536	$ 690,876
2011	5	0.56176	$ 315,036
2011	6	0.55741	$ (21,885)
2011	7	0.55563	$ 72,309
2011	8	0.55905	$ 41,711
2011	9	0.51299	$ 97,851
2011	10	0.49179	$ 266,325
2011	11	0.53329	$ 699,060
2011	12	0.51374	$ 1,290,398
2012	1	0.50747	$ 1,319,370
2012	2	0.47422	$ 1,276,601
2012	3	0.4766	$ 829,505
2012	4	0.43686	$ 356,144
2012	5	0.36777	$ 320,643
2012	6	0.38641	$ (39,527)
2012	7	0.40973	$ 43,150
2012	8	0.4416	$ 74,322
2012	9	0.40895	$ 95,819
2012	10	0.44586	$ 374,212
2012	11	0.47119	$ 795,148
2012	12	0.47647	$ 1,247,845
2013	1	0.47933	$ 1,150,915
2013	2	0.47379	$ 1,405,649
2013	3	0.49147	$ 829,715
2013	4	0.52209	$ 555,765
2013	5	0.57446	$ 629,111
2013	6	0.57653	$ 111,993

NNG Residential

Year	Month	GAS* COSTS	MARGIN REVENUE
2013	7	0.55793	$ 237,519
2013	8	0.55893	$ 435,771
2013	9	0.54309	$ 499,354
2013	10	0.5436	$ 769,591
2013	11	0.57652	$ 3,000,545
2013	12	0.57341	$ 5,565,923
2014	1	0.64087	$ 8,619,437
2014	2	0.69713	$ 6,904,807
2014	3	0.76961	$ 5,642,037
2014	4	0.67256	$ 3,419,462
2014	5	0.67047	$ 972,197
2014	6	0.65261	$ (82,648)
2014	7	0.6609	$ 163,246
2014	8	0.58272	$ 547,583
2014	9	0.59865	$ 591,757
2014	10	0.5942	$ 1,251,490
2014	11	0.60033	$ 2,998,781
2014	12	0.67574	$ 7,193,917
2015	1	0.57522	$ 5,910,516
2015	2	0.58248	$ 5,642,159
2015	3	0.58694	$ 6,399,870
2015	4	0.51971	$ 1,164,510
2015	5	0.46762	$ 694,662
2015	6	0.47197	$ 259,323
2015	7	0.46367	$ 261,910
2015	8	0.46357	$ 523,625
2015	9	0.45141	$ 562,973
2015	10	0.44833	$ 918,998
2015	11	0.42882	$ 1,812,128
2015	12	0.43647	$ 4,414,768
2016	1	0.43885	$ 6,720,320
2016	2	0.43219	$ 7,895,131
2016	3	0.40042	$ 3,142,865
2016	4	0.38246	$ 2,204,390
2016	5	0.44307	$ 773,880
2016	6	0.3096	$ 675,833
2016	7	0.38224	$ 258,792
2016	8	0.38965	$ 582,243
2016	9	0.42577	$ 795,174
2016	10	0.4285	$ 784,510
2016	11	0.40001	$ 2,411,527
2016	12	0.42918	$ 5,435,482
2017	1	0.48683	$ 6,448,269
2017	2	0.43831	$ 3,759,516
2017	3	0.39064	$ 4,503,874
2017	4	0.40083	$ 2,367,239
2017	5	0.41038	$ 1,470,166
2017	6	0.43273	$ 989,014
2017	7	0.40626	$ 1,266,149
2017	8	0.40103	$ 574,511
2017	9	0.42288	$ 662,748
2017	10	0.40034	$ 1,023,130
2017	11	0.41809	$ 3,847,632
2017	12	0.43567	$ 5,308,653
2018	1	0.43153	$ 10,233,516
2018	2	0.54191	$ 7,057,298
2018	3	0.40675	$ 5,518,023
2018	4	0.40035	$ 4,182,190
2018	5	0.41023	$ 887,943
2018	6	0.40897	$ 156,841
2018	7	0.41573	$ 551,277
2018	8	0.41291	$ 538,772
2018	9	0.41782	$ 959,497
2018	10	0.44154	$ 2,413,631
2018	11	0.4966	$ 3,908,435
2018	12	0.57017	$ 6,017,961
2019	1	0.54149	$ 8,755,179
2019	2	0.48729	$ 7,090,115
2019	3	0.45814	$ 5,800,107
2019	4	0.46121	$ 3,094,149
2019	5	0.41681	$ 1,666,488
2019	6	0.41668	$ 1,478,621
2019	7	0.38712	$ 1,285,522
2019	8	0.38975	$ 551,966
2019	9	0.38062	$ 711,242
2019	10	0.38706	$ 2,774,289
2019	11	0.45884	$ 4,576,657
2019	12	0.46457	$ 5,780,846

Consolidated Residential

Year	Month	GAS* COSTS	MARGIN REVENUE
2013	7	0.47661	$ (26,623)
2013	8	0.47303	$ (22,012)
2013	9	0.47474	$ 44,953
2013	10	0.47846	$ 140,645
2013	11	0.46712	$ 550,795
2013	12	0.49062	$ 978,683
2014	1	0.51386	$ 1,516,389
2014	2	0.65193	$ 1,238,674
2014	3	0.74803	$ 1,004,186
2014	4	0.58207	$ 551,446
2014	5	0.58739	$ 253,029
2014	6	0.55646	$ (50,956)
2014	7	0.55334	$ (57,321)
2014	8	0.48847	$ 39,754
2014	9	0.50302	$ 69,448
2014	10	0.51296	$ 218,769
2014	11	0.57338	$ 590,910
2014	12	0.5952	$ 1,293,095
2015	1	0.52515	$ 1,052,921
2015	2	0.47522	$ 991,242
2015	3	0.52264	$ 1,141,948
2015	4	0.43212	$ 230,997
2015	5	0.38945	$ 137,386
2015	6	0.40675	$ 17,903
2015	7	0.39624	$ (28,686)
2015	8	0.40609	$ 48,285
2015	9	0.39881	$ 62,110
2015	10	0.39916	$ 168,343
2015	11	0.393	$ 385,256
2015	12	0.38818	$ 809,662
2016	1	0.3959	$ 1,229,485
2016	2	0.38753	$ 1,300,960
2016	3	0.37177	$ 651,664
2016	4	0.31489	$ 402,315
2016	5	0.29986	$ 201,158
2016	6	0.29546	$ 16,972
2016	7	0.39067	$ 17,853
2016	8	0.34783	$ 56,887
2016	9	0.38356	$ 64,992
2016	10	0.39548	$ 220,532
2016	11	0.37388	$ 485,323
2016	12	0.38569	$ 881,224
2017	1	0.42216	$ 1,144,104
2017	2	0.39641	$ 2,338,185
2017	3	0.37644	$ 951,266
2017	4	0.36905	$ 397,562
2017	5	0.37369	$ 320,451
2017	6	0.38179	$ 101,547
2017	7	0.36668	$ 2,062
2017	8	0.35905	$ 65,769
2017	9	0.36078	$ 44,226
2017	10	0.35919	$ 207,593
2017	11	0.33682	$ 732,968
2017	12	0.30692	$ 1,047,575
2018	1	0.2885	$ 1,837,882
2018	2	0.34728	$ 1,284,342
2018	3	0.33935	$ 1,016,156
2018	4	0.32916	$ 743,317
2018	5	0.34125	$ 147,784
2018	6	0.34042	$ 22,977
2018	7	0.35545	$ 45,811
2018	8	0.36852	$ 57,224
2018	9	0.37098	$ 90,195
2018	10	0.3743	$ 499,253
2018	11	0.39789	$ 772,860
2018	12	0.49515	$ 889,982
2019	1	0.43899	$ 1,288,951
2019	2	0.3903	$ 1,564,587
2019	3	0.37846	$ 1,244,762
2019	4	0.3469	$ 560,552
2019	5	0.32806	$ 253,126
2019	6	0.32987	$ 52,270
2019	7	0.30516	$ (30,022)
2019	8	0.28252	$ 46,863
2019	9	0.2989	$ 93,927
2019	10	0.29916	$ 273,807
2019	11	0.36067	$ 908,264
2019	12	0.359847	$ 1,275,536

Albert Lea Residential

Year	Month	GAS* COSTS	MARGIN REVENUE
2013	7		
2013	8		
2013	9		
2013	10		
2013	11		
2013	12		
2014	1		
2014	2		
2014	3		
2014	4		
2014	5		
2014	6		
2014	7		
2014	8		
2014	9		
2014	10		
2014	11		
2014	12		
2015	1		
2015	2		
2015	3		
2015	4		
2015	5	0.3932	$ 27,176
2015	6	0.42673	$ 100,732
2015	7	0.41821	$ 7,787
2015	8	0.42253	$ 26,766
2015	9	0.4165	$ 31,954
2015	10	0.41205	$ 47,679
2015	11	0.37257	$ 103,832
2015	12	0.38323	$ 261,590
2016	1	0.40102	$ 386,922
2016	2	0.38964	$ 425,652
2016	3	0.36288	$ 179,752
2016	4	0.33509	$ 140,067
2016	5	0.39574	$ 50,626
2016	6	0.32027	$ 23,424
2016	7	0.39804	$ 21,304
2016	8	0.3928	$ 28,607
2016	9	0.4065	$ 37,838
2016	10	0.42055	$ 43,896
2016	11	0.40769	$ 129,610
2016	12	0.4324	$ 294,168
2017	1	0.47454	$ 367,136
2017	2	0.4444	$ 205,342
2017	3	0.40055	$ 255,811
2017	4	0.41009	$ 136,338
2017	5	0.40966	$ 65,674
2017	6	0.42416	$ 55,757
2017	7	0.41947	$ 44,465
2017	8	0.41424	$ 31,880
2017	9	0.44564	$ 30,845
2017	10	0.4231	$ 51,669
2017	11	0.44085	$ 221,729
2017	12	0.45843	$ 288,668
2018	1	0.43153	$ 565,402
2018	2	0.54191	$ 390,384
2018	3	0.40675	$ 304,581
2018	4	0.40035	$ 233,767
2018	5	0.41023	$ 49,689
2018	6	0.40897	$ 7,743
2018	7	0.41573	$ 24,769
2018	8	0.41291	$ 32,278
2018	9	0.41782	$ 38,987
2018	10	0.44154	$ 128,783
2018	11	0.4966	$ 219,850
2018	12	0.57017	$ 283,487
2019	1	0.54149	$ 358,765
2019	2	0.48729	$ 484,291
2019	3	0.45814	$ 400,094
2019	4	0.46121	$ 122,716
2019	5	0.41681	$ 83,221
2019	6	0.41668	$ 18,647

NNG Small C&I

Year	Month	GAS* COSTS	MARGIN REVENUE
2011	1	0.61103	$ 260,878
2011	2	0.61794	$ 228,393
2011	3	0.60496	$ 157,892
2011	4	0.6133	$ 76,942
2011	5	0.61012	$ (13,217)
2011	6	0.60734	$ (11,948)
2011	7	0.60414	$ 3,650
2011	8	0.61333	$ 8,469
2011	9	0.56851	$ 15,218
2011	10	0.54608	$ 19,387
2011	11	0.5966	$ 54,421
2011	12	0.58007	$ 128,167
2012	1	0.56467	$ 164,016
2012	2	0.52995	$ 162,252
2012	3	0.5344	$ 105,012
2012	4	0.51893	$ (17,247)
2012	5	0.46855	$ 23,248
2012	6	0.45904	$ (1,258)
2012	7	0.47173	$ 5,621
2012	8	0.5087	$ 10,295
2012	9	0.46959	$ 13,565
2012	10	0.4965	$ 43,608
2012	11	0.53469	$ 79,274
2012	12	0.5503	$ 159,598
2013	1	0.51287	$ 252,592
2013	2	0.50785	$ 376,418
2013	3	0.52124	$ 220,088
2013	4	0.56577	$ 159,065
2013	5	0.60472	$ 50,324
2013	6	0.60947	$ (52,759)

Viking Small C&I

Year	Month	GAS* COSTS	MARGIN REVENUE
2011	1	0.52445	$ 10,022
2011	2	0.52275	$ 9,098
2011	3	0.51315	$ 7,607
2011	4	0.50728	$ 2,539
2011	5	0.52233	$ 256
2011	6	0.51753	$ (265)
2011	7	0.51662	$ 153
2011	8	0.51659	$ 545
2011	9	0.46953	$ 476
2011	10	0.46334	$ 1,508
2011	11	0.48621	$ 2,440
2011	12	0.4644	$ 7,739
2012	1	0.46355	$ 7,022
2012	2	0.43105	$ 9,535
2012	3	0.43226	$ 5,602
2012	4	0.38021	$ (230)
2012	5	0.29945	$ 1,181
2012	6	0.33517	$ 146
2012	7	0.36502	$ 313
2012	8	0.39395	$ 420
2012	9	0.36502	$ 624
2012	10	0.40817	$ 2,035
2012	11	0.40874	$ 5,242
2012	12	0.40857	$ 10,492
2013	1	0.41512	$ 13,811
2013	2	0.40918	$ 18,745
2013	3	0.42975	$ 11,630
2013	4	0.44931	$ 8,191
2013	5	0.51036	$ 6,777
2013	6	0.50946	$ (2,387)

Great Lakes Small C&I

Year	Month	GAS* COSTS	MARGIN REVENUE
2011	1	0.51121	$ 22,915
2011	2	0.5091	$ 15,307
2011	3	0.50022	$ 13,632
2011	4	0.49917	$ 5,056
2011	5	0.514	$ (2,535)
2011	6	0.50902	$ (935)
2011	7	0.50797	$ (179)
2011	8	0.5078	$ 223
2011	9	0.46098	$ 379
2011	10	0.44674	$ 1,346
2011	11	0.46845	$ 3,670
2011	12	0.44711	$ 11,516
2012	1	0.44613	$ 10,266
2012	2	0.41409	$ 13,459
2012	3	0.41533	$ 7,843
2012	4	0.36725	$ 1,021
2012	5	0.28703	$ 1,278
2012	6	0.32263	$ (812)
2012	7	0.35229	$ 241
2012	8	0.38104	$ 481
2012	9	0.3523	$ 660
2012	10	0.39509	$ 2,545
2012	11	0.40698	$ 8,253
2012	12	0.40544	$ 14,512
2013	1	0.406	$ 24,340
2013	2	0.40018	$ 27,682
2013	3	0.42071	$ 17,653
2013	4	0.44326	$ 14,229
2013	5	0.5047	$ 9,563
2013	6	0.50674	$ (3,644)

NMU Small C&I

Year	Month	GAS* COSTS	MARGIN REVENUE
2011	1	0.56243	$ 106,958
2011	2	0.56379	$ 64,508
2011	3	0.55312	$ 80,890
2011	4	0.5536	$ 35,029
2011	5	0.56176	$ 2,070
2011	6	0.55741	$ (6,535)
2011	7	0.55563	$ 3,347
2011	8	0.55905	$ 1,984
2011	9	0.51299	$ 3,802
2011	10	0.49179	$ 8,119
2011	11	0.53329	$ 29,195
2011	12	0.51374	$ 67,461
2012	1	0.50747	$ 71,219
2012	2	0.47422	$ 79,630
2012	3	0.4766	$ 45,465
2012	4	0.43686	$ 12,789
2012	5	0.36777	$ 16,545
2012	6	0.38641	$ (5,075)
2012	7	0.40973	$ 1,257
2012	8	0.4416	$ 4,032
2012	9	0.40895	$ 4,468
2012	10	0.44586	$ 15,227
2012	11	0.47119	$ 41,301
2012	12	0.47647	$ 97,612
2013	1	0.47933	$ 81,245
2013	2	0.47379	$ 114,977
2013	3	0.49147	$ 62,373
2013	4	0.52209	$ 47,062
2013	5	0.57446	$ 46,200
2013	6	0.57653	$ (16,533)

NNG Small C&I

Year	Month	GAS* COSTS	MARGIN REVENUE
2013	7	0.55793	$ 3,345
2013	8	0.55893	$ 15,573
2013	9	0.54309	$ 17,228
2013	10	0.54360	$ 148,092
2013	11	0.57652	$ 129,069
2013	12	0.57341	$ 326,616
2014	1	0.64087	$ 583,804
2014	2	0.69713	$ 491,316
2014	3	0.76961	$ 370,117
2014	4	0.67256	$ 182,445
2014	5	0.67047	$ 8,344
2014	6	0.65261	$ (31,521)
2014	7	0.66090	$ (5,742)
2014	8	0.58272	$ 16,477
2014	9	0.59865	$ 20,991
2014	10	0.59420	$ 73,595
2014	11	0.60033	$ 197,614
2014	12	0.67574	$ 501,087
2015	1	0.57522	$ 1,052,921
2015	2	0.58248	$ 991,242
2015	3	0.58694	$ 1,141,948
2015	4	0.51971	$ 230,997
2015	5	0.46762	$ 137,386
2015	6	0.47197	$ 17,903
2015	7	0.46367	$ (28,686)
2015	8	0.46357	$ 48,285
2015	9	0.45141	$ 62,110
2015	10	0.44833	$ 168,343
2015	11	0.42882	$ 385,256
2015	12	0.43647	$ 809,662
2016	1	0.43885	$ 227,056
2016	2	0.43219	$ 249,001
2016	3	0.40042	$ 298,713
2016	4	0.38246	$ (273,902)
2016	5	0.44307	$ 238,655
2016	6	0.30960	$ (61,912)
2016	7	0.38224	$ 157,829
2016	8	0.38965	$ (64,921)
2016	9	0.42577	$ (44,251)
2016	10	0.42850	$ 17,456
2016	11	0.40001	$ 153,053
2016	12	0.42918	$ 106,826
2017	1	0.48683	$ 329,060
2017	2	0.43831	$ 424,619
2017	3	0.39064	$ 117,024
2017	4	0.40083	$ 71,392
2017	5	0.41038	$ 198,568
2017	6	0.43273	$ (223,503)
2017	7	0.40626	$ 11,205
2017	8	0.40103	$ 30,108
2017	9	0.42288	$ 18,011
2017	10	0.40034	$ 25,862
2017	11	0.41809	$ 202,129
2017	12	0.43567	$ 200,399
2018	1	0.43153	$ 714,358
2018	2	0.54191	$ 139,382
2018	3	0.40675	$ 166,384
2018	4	0.40035	$ 135,446
2018	5	0.41023	$ 61,401
2018	6	0.40897	$ (14,871)
2018	7	0.41573	$ 7,714
2018	8	0.41291	$ 12,434
2018	9	0.41782	$ 15,247
2018	10	0.44154	$ 66,930
2018	11	0.4966	$ 233,294
2018	12	0.57017	$ 180,659
2019	1	0.54149	$ 393,610
2019	2	0.48729	$ 390,605
2019	3	0.45814	$ 101,240
2019	4	0.46121	$ 99,080
2019	5	0.41681	$ 104,511
2019	6	0.41668	$ 35,313
2019	7	0.38712	$ (25,692)
2019	8	0.38975	$ 44,638
2019	9	0.38062	$ 31,265
2019	10	0.38706	$ 81,436
2019	11	0.45884	$ 104,730
2019	12	0.46457	$ 219,981

Consolidated Small C&I

Year	Month	GAS* COSTS	MARGIN REVENUE
2013	7	0.47661	$ (3,452)
2013	8	0.47303	$ 3,569
2013	9	0.47474	$ 4,224
2013	10	0.47846	$ 9,294
2013	11	0.46712	$ 69,980
2013	12	0.49062	$ 84,468
2014	1	0.51386	$ 175,597
2014	2	0.65193	$ 139,998
2014	3	0.74803	$ 121,066
2014	4	0.58207	$ 47,037
2014	5	0.58739	$ 13,251
2014	6	0.55646	$ (4,389)
2014	7	0.55334	$ (4,601)
2014	8	0.48847	$ 5,447
2014	9	0.50302	$ 5,872
2014	10	0.51296	$ 19,174
2014	11	0.57338	$ 52,915
2014	12	0.5952	$ 145,460
2015	1	0.52515	$ 131,228
2015	2	0.47522	$ 114,252
2015	3	0.52264	$ 138,386
2015	4	0.43212	$ 12,435
2015	5	0.38945	$ 4,725
2015	6	0.40675	$ (9,092)
2015	7	0.39624	$ (916)
2015	8	0.40609	$ 3,816
2015	9	0.39881	$ 3,180
2015	10	0.39916	$ 7,377
2015	11	0.393	$ 17,127
2015	12	0.38818	$ 45,070
2016	1	0.3959	$ 76,803
2016	2	0.38753	$ 87,964
2016	3	0.37177	$ 36,161
2016	4	0.31489	$ 20,867
2016	5	0.29986	$ 6,586
2016	6	0.29546	$ 28,238
2016	7	0.39067	$ (25,603)
2016	8	0.34783	$ 1,348
2016	9	0.38356	$ 4,189
2016	10	0.39548	$ 10,517
2016	11	0.37388	$ 74,106
2016	12	0.38569	$ 15,299
2017	1	0.42216	$ 99,519
2017	2	0.39641	$ 83,440
2017	3	0.37644	$ 54,655
2017	4	0.36905	$ 32,485
2017	5	0.37369	$ 8,339
2017	6	0.38179	$ 4,073
2017	7	0.36668	$ 3,488
2017	8	0.35905	$ 4,207
2017	9	0.36078	$ 5,063
2017	10	0.35919	$ 11,394
2017	11	0.33682	$ 50,727
2017	12	0.30692	$ 83,478
2018	1	0.2885	$ 141,352
2018	2	0.34728	$ 101,733
2018	3	0.33935	$ 71,599
2018	4	0.32916	$ 43,735
2018	5	0.34125	$ 13,057
2018	6	0.34042	$ (3,799)
2018	7	0.35545	$ 1,993
2018	8	0.36852	$ 3,744
2018	9	0.37098	$ 5,606
2018	10	0.3743	$ 34,386
2018	11	0.39789	$ 47,726
2018	12	0.49515	$ 73,864
2019	1	0.43899	$ 100,630
2019	2	0.3903	$ 126,221
2019	3	0.37846	$ 65,094
2019	4	0.3469	$ 26,805
2019	5	0.32806	$ 7,601
2019	6	0.32987	$ (1,443)
2019	7	0.30516	$ (906)
2019	8	0.28252	$ 2,153
2019	9	0.2989	$ 9,504
2019	10	0.29916	$ 82,166
2019	11	0.36067	$ 46,575
2019	12	0.359847	$ 77,209

Albert Lea Small C&I

Year	Month	GAS* COSTS	MARGIN REVENUE
2013	7		
2013	8		
2013	9		
2013	10		
2013	11		
2013	12		
2014	1		
2014	2		
2014	3		
2014	4		
2014	5		
2014	6		
2014	7		
2014	8		
2014	9		
2014	10		
2014	11		
2014	12		
2015	1		
2015	2		
2015	3		
2015	4		
2015	5	0.39320	$ 1,384
2015	6	0.42673	$ 1,158
2015	7	0.41821	$ (178)
2015	8	0.42253	$ (972)
2015	9	0.41650	$ 6,823
2015	10	0.41205	$ (1,700)
2015	11	0.37257	$ 11,401
2015	12	0.38323	$ 6,074
2016	1	0.40102	$ 14,015
2016	2	0.38964	$ (14,436)
2016	3	0.36288	$ 17,253
2016	4	0.33509	$ 412
2016	5	0.39574	$ 1,305
2016	6	0.32027	$ 393
2016	7	0.39804	$ 2,316
2016	8	0.39280	$ (1,148)
2016	9	0.40650	$ 1,646
2016	10	0.42055	$ 2,968
2016	11	0.40769	$ 8,299
2016	12	0.43240	$ 4,483
2017	1	0.47454	$ 9,197
2017	2	0.44440	$ 9,170
2017	3	0.40055	$ 5,478
2017	4	0.41009	$ 3,604
2017	5	0.40966	$ 1,633
2017	6	0.42416	$ 976
2017	7	0.41947	$ 961
2017	8	0.41424	$ 1,074
2017	9	0.44564	$ 1,368
2017	10	0.42310	$ 2,216
2017	11	0.44085	$ 14,958
2017	12	0.45843	$ 11,617
2018	1	0.43153	$ 14,123
2018	2	0.54191	$ 12,524
2018	3	0.40675	$ 15,715
2018	4	0.40035	$ 10,150
2018	5	0.41023	$ 3,132
2018	6	0.40897	$ (543)
2018	7	0.41573	$ 424
2018	8	0.41291	$ 809
2018	9	0.41782	$ 1,140
2018	10	0.44154	$ 4,023
2018	11	0.4966	$ 10,141
2018	12	0.57017	$ 11,313
2019	1	0.54149	$ 18,721
2019	2	0.48729	$ 31,140
2019	3	0.45814	$ 15,633
2019	4	0.46121	$ 4,238
2019	5	0.41681	$ 1,428
2019	6	0.41668	$ (167)

*Gas Costs exclude the ACA Factor

ATTACHMENT C

DORSEY
DORSEY & WHITNEY LLP

MICHAEL J. AHERN
(612) 340-2881
FAX (612) 340-2643
ahern.michael@dorsey.com

May 1, 2013

VIA ELECTRONIC FILING

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: Minnesota Energy Resources Corporation Gas Service Quality Standards Report
Docket No. G007,011/M-13-__

Dear Dr. Haar:

Enclosed for filing is Minnesota Energy Resources Corporation's (MERC's) Annual Gas Service Quality Standards Report for 2012.

Please feel free to contact me at (612) 340-2881 if you have any questions regarding this matter.

Sincerely yours,

/s/ Michael J. Ahern

Michael J. Ahern

cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
J. Dennis O'Brien	Commissioner
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Betsy Wergin	Commissioner

In the Matter of the Annual Service Quality Report for Minnesota Energy Resources Corporation for 2012	Docket No. G007,011/M-13-__

ANNUAL SERVICE QUALITY REPORT

Minnesota Energy Resources Corporation ("MERC" or the "Company") submits this Annual Report for 2012 in compliance with the Minnesota Public Utilities Commission's August 26, 2010 Order Setting Reporting Requirements in Docket No. G-999/CI-09-409 and March 6, 2012, Order Accepting Reports and Setting Further Requirements in Docket No. G-007,011/M-10-374.

A. Call Center Response Time

Each utility is required to report call center response time in terms of the percentage of calls answered within 20 seconds.

MERC Response: The required information is provided in Attachment A.

B. Meter Reading Performance Data

Each utility is required to report the meter reading performance data contained in Minn. Rules, part 7826.1400.

7826.1400 REPORTING METER-READING PERFORMANCE.

The annual service quality report must include a detailed report on the utility's meter-reading performance, including, for each customer class and for each calendar month:

A. the number and percentage of customer meters read by utility personnel;
B. the number and percentage of customer meters self-read by customers;
C. the number and percentage of customer meters that have not been read by utility personnel for periods of six to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read; and
D. data on monthly meter-reading staffing levels, by work center or geographical area.

MERC Response: The required information is provided in Attachment B. The data for self reads includes both estimates and customer self reads.

In its March 6, 2012, Order Setting Further Reporting Requirements, the Commission also requested utilities to explain in their annual reports whether the difference between the total percentage of meters (100%) and the percentage of meters read (by both the utility and the customers) is equal to the percentage of estimated meter reads.

MERC Response: MERC's system does not differentiate between an estimate and a customer read so the customer read numbers include both estimates and customer self reads.

C. Involuntary Service Disconnections

In lieu of reporting data on involuntary service disconnections as contained in Minn. Rules, part 7826.1500, each utility shall reference the data that it submits under Minn. Stat. §§ 216B.091 and 216B.096.

MERC Response: MERC refers to its monthly reports filed with the Commission under Minn. Stat. §§ 216B.091 and 216B.096, and attached to this report as Attachment C. In particular:

1. The number of customers who received disconnection notices is reported in item 20 of MERC's monthly report.

2. The number of customers who sought Cold Weather Rule protection under chapter 7820 is reported in item 3, and the number of customers who sought Cold Weather Rule protection and whose service was disconnected is provided in item 22 of MERC's monthly report.

3. The total number of customers whose service was disconnected involuntarily is provided in item 23 of MERC's monthly report, and the number of customers whose service was disconnected for 24 hours or more is reported in item 34.

4. The number of customer accounts granted a reconnection request are reported in item 6 of MERC's monthly report.

D. Service Extension Requests

Each utility shall report the service extension request response time data contained in Minn. Rules, part 7826.1600, items A and B, except that data reported under Minn. Stat. 216B.091 and 216B.096, subd. 11, is not required.

7826.1600 REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES.

The annual service quality report must include a report on service extension request response times, including, for each customer class and each calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

MERC Response: The required information is provided in Attachment E. "New installs" represent new service requests at locations where no gas service exists, either because the location is new construction or because an alternate fuel source has been used there previously. "Existing" installs represent any building that has previously had natural gas service, where the service has previously been disconnected.

In its March 6, 2012, Order Setting Further Reporting Requirements, the Commission also requested utilities to explain the types of extension requests included in the data on service extension request response times for locations previously served and not previously served.

MERC Response: For locations not previously served, new service requests are for service where no gas exists, usually for new construction or an existing customer who requests new service to convert to natural gas. For locations previously served, new service requests consist of requests to turn on service after the service was disconnected at the previous customer's request. Disconnections for non-payment are not included in MERC's response.

E. Customer Deposits

Each utility shall report the customer deposit data contained in Minn. Rules, part 7826.1900.

7826.1900 REPORTING CUSTOMER DEPOSITS.

The annual service quality report must include the number of customers who were required to make a deposit as a condition of receiving service.

MERC Response: Twenty-three customers were required to make deposits in 2012, all due to diversion (theft).

In its March 6, 2012, Order Setting Further Reporting Requirements, the Commission also requested utilities to explain the types of deposits included in the reported number of "required customer deposits."

MERC Response: MERC had twenty-three new deposits in 2012 and all were required from customers because of theft of service. In total, MERC holds 695 deposits, 672 of which were required before 2012.

F. Customer Complaints

Each utility shall report the customer complaint data contained in Minn. Rules, part 7826.2000.

7826.2000 REPORTING CUSTOMER COMPLAINTS.

The annual service quality report must include a detailed report on complaints by customer class and calendar month, including at least the following information:

A. the number of complaints received;

B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service-extension intervals, service-restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;

C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;

D. the number and percentage of all complaints resolved by taking any of the following actions:

(1) taking the action the customer requested;

(2) taking an action the customer and the utility agree is an acceptable compromise;

(3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or

(4) refusing to take the action the customer requested; and

E. the number of complaints forwarded to the utility by the commission's Consumer Affairs Office for further investigation and action.

MERC Response: The required information is provided in Attachment G.

G. Telephone Answer Times

Each utility shall report data on telephone answer times to its gas emergency phone line calls.

MERC Response: The required information is provided in Attachment H.

H. Mislocates

Each utility shall report data on mislocates, including the number of times a line is damaged due to a mismarked line or failure to mark a line.

MERC Response: The required information is provided in Attachment I. All of the mislocates noted in Attachment I resulted in a damaged line.

I. Damaged Gas Lines

Each utility shall report data on the number of gas lines damaged. The damage shall be categorized according to whether it was caused by the utility's employees or contractors, or whether it was due to any other unplanned cause.

MERC Response: The required information is provided in Attachment J.

J. Service Interruptions

Each utility shall report data on service interruptions. Each interruption shall be categorized according to whether it was caused by the utility's employees or contractors, or whether it was due to any other unplanned cause.

MERC Response: The required information is provided in Attachment K.

K. MOPS Reportable Events

Each utility shall report summaries of major events that are immediately reportable to the Minnesota Office of Pipeline Safety (MOPS) according to the criteria used by MOPS to identify reportable events. Each utility shall also provide summaries of all service interruptions caused by system integrity pressure issues. Each summary shall include the following ten items:

- the location;
- when the incident occurred;
- how many customers were affected;
- how the company was made aware of the incident;
- the root cause of the incident;
- the actions taken to fix the problem;
- what actions were taken to contact customers;
- any public relations or media issues;
- whether the customer or the company relighted; and
- the longest any customer was without gas service during the incident.

MERC Response: The required information is provided in Attachment L.

L. Notification of Reportable Events

Each utility shall provide the Commission and the OES with notification of reportable events as they are defined by MOPS, contemporaneous with the utility's notification of the event to MOPS. The notice should be sent to the Commission's Consumer Affairs Office at consumer.puc@state.mn.us and shall describe the location and cause of the event, the number of customers affected, the expected duration of the event, and the utility's best estimate of when service will be restored.

MERC Response: MERC is currently providing the Commission and the OES with notification of reportable events contemporaneous with the utility's notification of the event to MOPS through reporting to the Commission's Consumer Affairs Office.

M. Gas Emergency Response Times

Each utility shall report data on gas emergency response times and include the percentage of emergencies responded to within one hour and within more than one hour. CenterPoint, IPL, and MERC shall also report the average number of minutes it takes to respond to an emergency.

MERC Response: The required information is provided in Attachment H. The gas emergency call response times include all calls reporting a suspected gas leak, as well as all line hits.

In its March 6, 2012, Order Setting Further Reporting Requirements, the Commission also requested utilities to describe the types of gas emergency calls included in their gas emergency response times, as well as the types of emergency calls included in their reports to the Minnesota Office of Pipeline Safety (MOPS). Further, utilities must explain any difference between the reports provided to the Commission and MOPS.

MERC Response: The information provided in Attachment H includes response time for all calls reporting a suspected gas leak and line hits. The information in Attachment H is the same information provided to MOPS.

N. Customer-Service Related Operations and Maintenance Expenses

Each utility shall report customer-service related operations and maintenance expenses. The reports shall include only Minnesota-regulated, customer-service expenses and shall be based on the costs each utility records in its FERC accounts 901 and 903, plus payroll taxes and benefits.

MERC Response: The required information is provided in Attachment O.

Calls answered within 20 seconds

2012	January	February	March	April	May	June	July	August	September	October	November	December
Total calls	27,186	26,062	27,281	27,336	29,152	25,052	25,125	25,125	25,867	34,098	27,905	27,662
Average speed of answer	19	20	21	22	21	17	16	19	19	23	18	18
% answered in 20 seconds	80.14%	81.19%	80.03%	80.30%	80.72%	83.69%	84.15%	83.19%	81.95%	79.13%	82.32%	81.87%

Answer time for gas emergency phone lines

2012

	January	February	March	April	May	June	July	August	September	October	November	December	AVERAGE	TOTAL
Total calls	1,628	1,312	1,235	1,244	1,339	1,279	1,337	1,317	1,401	1,720	1,912	1,617	1,445	17,341
Average speed of answer	7	7	7	6	7	7	7	7	5	6	9	7	7	
% answered in 15 seconds	90.57%	91.39%	91.41%	92.96%	92.33%	92.81%	93.78%	92.71%	94.28%	95.20%	89.07%	91.46%	92.33%	

***note: increase in Nov due to propane plant release resulting in over 300 leak calls**

Meter Reading

2012

2012	Total meters	# company read	% company read	# self-read	% of self-read	# not read in 6-12 months	% not read in 6-12 months	# not read > 12 months	% not read > 12 months	Comments
w/o farm taps										
January	212,620	207,986	97.82%	4,634	2.18%	0	0.0000%	0	0.0000%	accessibility and dogs
February	212,655	208,643	98.11%	4,012	1.89%	0	0.0000%	0	0.0000%	accessibility and dogs
March	212,395	207,809	97.84%	4,586	2.16%	0	0.0000%	0	0.0000%	accessibility and dogs
April	212,652	209,949	98.73%	2,703	1.27%	0	0.0000%	0	0.0000%	accessibility and dogs
May	212,669	210,502	98.98%	2,167	1.02%	1	0.0005%	0	0.0000%	accessibility and dogs
June	212,728	207,384	97.49%	5,344	2.51%	1	0.0005%	0	0.0000%	accessibility and dogs
July	212,592	207,680	97.69%	4,912	2.31%	1	0.0005%	0	0.0000%	accessibility and dogs
August	212,787	207,871	97.69%	4,916	2.31%	1	0.0005%	0	0.0000%	accessibility and dogs
September	212,918	209,932	98.60%	2,986	1.40%	3	0.0014%	0	0.0000%	accessibility and dogs
October	213,145	209,339	98.21%	3,806	1.79%	3	0.0014%	0	0.0000%	accessibility and dogs
November	213,419	207,756	97.35%	5,663	2.65%	3	0.0014%	0	0.0000%	accessibility and dogs
December	213,723	209,799	98.16%	3,924	1.84%	3	0.0014%	0	0.0000%	accessibility and dogs
Total	2,554,303	2,504,650	98.06%	49653	1.94%	16	0.0006%	0	0.0000%	
with farm taps										
January	214,527	209,893	97.84%	6541	3.05%	8	0.0037%	9	0.0042%	
February	214,562	210,550	98.13%	5919	2.76%	12	0.0056%	9	0.0042%	
March	214,302	209,716	97.86%	6493	3.03%	12	0.0056%	9	0.0042%	
April	214,559	211,856	98.74%	4610	2.15%	17	0.0079%	9	0.0042%	
May	214,576	212,409	98.99%	4074	1.90%	22	0.0103%	15	0.0070%	
June	214,635	209,291	97.51%	7251	3.38%	23	0.0107%	20	0.0093%	
July	214,499	209,587	97.71%	6819	3.18%	24	0.0112%	28	0.0131%	
August	214,694	209,778	97.71%	6823	3.18%	26	0.0121%	28	0.0130%	
September	214,825	211,839	98.61%	4893	2.28%	131	0.0610%	31	0.0144%	
October	215,052	211,246	98.23%	5713	2.66%	409	0.1902%	32	0.0149%	
November	215,326	209,663	97.37%	7570	3.52%	664	0.3084%	37	0.0172%	
December	215,630	211,706	98.18%	5831	2.70%	749	0.3474%	43	0.0199%	
Total	2,577,187	2,527,534	98.07%	72,537	2.81%	2,097	0.0814%	270	0.0105%	

	January	February	March	April	May	June	July	August	September	October	November	December
Meter reading staffing*	32.54	33.34	31.88	39.19	26.15	23.38	24.07	25.32	24.29	36.56	23.92	28.5

* approximate FTEs based on labor reports

Attachment C

Minnesota Energy Resources
Service Quality Report

Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091) Docket #12-02

Company: Minnesota Energy Resources for report period ending:

		Jan-2012	Feb-2012	Mar-2012	Apr-2012	May-2012	Jun-2012	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Nov-2012	Dec-2012
1	Number of Residential Customer Accounts:	190,743	190,925	190,816	190,895	190,980	191,221	190,719	190,924	190,340	191,264	191,497	191,963
2	Number of Past Due Residential Customer Accounts:	26,780	28,578	31,857	34,455	32,851	31,570	26,948	22,051	21,207	18,428	19,781	20,338
3	Number of Cold Weather Protection Requests:	675	654	334							2,639	629	476
RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS													
4	Number of "Right to Appeal" notices mailed to customers:	0	0	0	0	0	0	0	0	0	0	1	0
5	*Intentionally Blank*												
6	Number of customer accounts granted reconnection request:	86	127	183							1,218	289	96

INABILITY TO PAY (ITP)

10% PLAN (TPP)

Minnesota Energy Resources
Service Quality Report

Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091) Docket #12-02

Company: Minnesota Energy Resources for report period ending:

		Jan-2012	Feb-2012	Mar-2012	Apr-2012	May-2012	Jun-2012	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Nov-2012	Dec-2012
PAYMENT SCHEDULE (PS)													
16	Number of "Right to Appeal" notices mailed to customers:	0	0	0							0	1	0
a)	Number of PS requests received	675	654	334							2,639	629	476
17	*Intentionally Blank*												
18	Number of PS negotiations mutually agreed upon:	675	654	334							2,639	629	476
19	*Intentionally Blank*												
DISCONNECTIONS													
20	Number of disconnection notices mailed to customers:	6,834	6,808	10,370	8,386	7,433	4,648	2,356	1,416	961	1,114	1,419	3,866
21	Number of customer accounts disconnected who did not seek protection:												
	Duplicate columns for use in April and October												
	April 1-15 and October 1-15 in 1st column												
	All other months, use 1st column only												
a)	# Electric - heat affected												
b)	# Electric - heat not affected												
c)	# Gas - heat affected	65	159	354	159	1,529	1,371	1,314	514	269	152	15	14
d)	# Gas - heat not affected												
e)	**Total** # disconnected	65	159	354	159	1,529	1,371	1,314	514	269	152	15	14
	April 16-30 and October 16-31 in 2nd column												
	All other months, use 1st column only												
a)	# Electric - heat affected												
b)	# Electric - heat not affected												
c)	# Gas - heat affected				463						14		
d)	# Gas - heat not affected												
e)	**Total** # disconnected	0	0	0	463	0	0	0	0	0	14	0	0
22	Number of customer accounts disconnected seeking protection:												
a)	# Electric - heat affected												
b)	# Electric - heat not affected												
c)	# Gas - heat affected												
d)	# Gas - heat not affected												
e)	Total # disconnected (See Note)	0	0	0	0	0	0	0	0	0	0	0	0
	NOTE: Please report immediately the names and addresses of customers whose service has been disconnected more than 24 hours.												
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	65	159	354	588	1,529	1,371	1,314	514	269	166	15	14

Minnesota Energy Resources
Service Quality Report

Minnesota Cold Weather Rule Compliance Questionnaire
Utility Monthly Reports (216B.091) Docket #12-02

Company: Minnesota Energy Resources for report period ending:

		Jan-2012	Feb-2012	Mar-2012	Apr-2012	May-2012	Jun-2012	Jul-2012	Aug-2012	Sep-2012	Oct-2012	Nov-2012	Dec-2012
DOLLAR VALUE													
24	**Total** dollars past due on all residential accounts:	$3,250,133	$3,812,235	$4,573,213	$4,956,371	$3,987,257	$3,454,707	$2,732,589	$2,178,140	$1,959	$1,679,811	$1,823,628	$2,130,546
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$121	$133	$144	$144	$121	$109	$101	$99	$92	$91	$92	$105
26	**Total** dollars received from energy assistance programs:	$783,937	$850,960	$463,831	$387,489	$268,727	$119,153	$14,781	$169	$0	$0	$399,578	$562,213
27	**Total** dollars received from other sources (private organizations):	$0	$0	$0	$0	$0	$0	$1,931	$0	$0	$0	$0	$0
28	**Total** Revenue from sales to residential accounts:	$22,927,081	$21,494,738	$14,691,251	$2,948,298	$5,776,912	$1,315,315	$2,939,455	$3,271,495	$3,514,489	$6,481,289	$13,255,927	$20,067,497
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$120	$113	$77	$15	$30	$7	$15	$17	$18	$34	$69	$105
30	*Intentionally Blank*												
30	**Average** annual residential bill:												
31	**Total** residential account write-offs due to uncollectible:	$116,686	$86,385	$74,299	$161,146	$158,702	$212,391	$148,935	$133,246	$134,318	$77,856	$70,034	$71,818
DISCONNECTION DURATION													
32	Number of customer accounts disconnected 24 hours or more:												
	a) # Electric - heat affected												
	b) # Electric - heat not affected												
	c) # Gas - heat affected	34	139	289							131	8	8
	d) # Gas - heat not affected												
	e) **Total** # disconnected	34	139	289									
33	*Intentionally Blank*												
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	34	139	289							131	8	8
35	*Intentionally Blank*												
36	*Intentionally Blank*												
RECONNECTION DATA													
37	# Accounts reconnected	86	127	183	270	423	590	673	503	577	1,218	289	96
38	# Accounts remaining disconnected	452	385	419	534	1,572	2,322	2,754	2,671	2,191	950	563	422
	a) 1-30 days	18	58	185	289	1,098	826	649	142	46	32	3	3
	b) 31-60 days	4	17	56	179	281	1,037	792	507	110	41	30	2
	c) 61+ days	430	310	178	66	193	459	1,313	2,022	2,035	877	530	417

Monthly CWR January 2012.xls

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	January	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: January, 2012

1	Number of Residential Customer Accounts:	190,743
2	Number of Past Due Residential Customer Accounts:	26,780
3	Number of Cold Weather Protection Requests:	675

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	*Intentionally Blank*	
6	Number of customer accounts granted reconnection request:	86

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR January 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: January, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0		
a)	Number of PS requests received	675		
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:	675		
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:			*Required*
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	65		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	65	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	65	65	

Monthly CWR January 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: January, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$3,250,133
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$121
26	**Total** dollars received from energy assistance programs:	$783,937
27	**Total** dollars received from other sources (private organizations):	$0
28	**Total** Revenue from sales to residential accounts:	$22,927,081
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$120
30	*Intentionally Blank*	
31	**Total** residential account write-offs due to uncollectible:	$116,686

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected	34	
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	34	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	34	
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	86
38	# Accounts remaining disconnected	452
	a) 1-30 days	18
	b) 31-60 days	4
	c) 61+ days	430

[END]

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Monthly CWR February 2012.xls

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	February	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: February, 2012

1	Number of Residential Customer Accounts:	190,925
2	Number of Past Due Residential Customer Accounts:	28,578
3	Number of Cold Weather Protection Requests:	654

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	*Intentionally Blank*	
6	Number of customer accounts granted reconnection request:	127

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR February 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: February, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0	
a)	Number of PS requests received	654	
17	*Intentionally Blank*		
18	Number of PS negotiations mutually agreed upon:	654	
19	*Intentionally Blank*		

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	6,808		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	159		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	159	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	159	159	

Monthly CWR February 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: February, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$3,812,235
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$133
26	**Total** dollars received from energy assistance programs:	$850,960
27	**Total** dollars received from other sources (private organizations):	$0
28	**Total** Revenue from sales to residential accounts:	$21,494,738
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$113
30	*Intentionally Blank*	
31	**Total** residential account write-offs due to uncollectible:	$86,385

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected	139	
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	139	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	139	
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	127
38	# Accounts remaining disconnected	385
	a) 1-30 days	58
	b) 31-60 days	17
	c) 61+ days	310

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	March	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: March, 2012

1	Number of Residential Customer Accounts:	190,816
2	Number of Past Due Residential Customer Accounts:	31,857
3	Number of Cold Weather Protection Requests:	334

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	*Intentionally Blank*	
6	Number of customer accounts granted reconnection request:	183

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Company: Minnesota Energy Resources People's Natural Gas for report period ending: March, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0		
a)	Number of PS requests received	334		
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:	334		
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	10,370		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	354		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	354	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	354	354	

Monthly CWR March 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: March, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$4,573,213
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$144
26	**Total** dollars received from energy assistance programs:	$463,831
27	**Total** dollars received from other sources (private organizations):	$0
28	**Total** Revenue from sales to residential accounts:	$14,691,251
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$77
30	*Intentionally Blank*	
31	**Total** residential account write-offs due to uncollectible:	$74,299

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected	289	
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	289	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	289	
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	183
38	# Accounts remaining disconnected	419
	a) 1-30 days	185
	b) 31-60 days	56
	c) 61+ days	178

[END]

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Monthly CWR April 2012.xls

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	April	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: April, 2012

1	Number of Residential Customer Accounts:	190,895	
2	Number of Past Due Residential Customer Accounts:	34,455	
3	Number of Cold Weather Protection Requests:		*CWR period only*

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:		*<< Invalid Number*
5	*Intentionally Blank*		
6	Number of customer accounts granted reconnection request:		*CWR period only*

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR April 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: April, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:			*CWR period only*
a)	Number of PS requests received			*CWR period only*
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:			*CWR period only*
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	8,386		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	588		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	588	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	588	588	

Company: Minnesota Energy Resources People's Natural Gas for report period ending: April, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$4,956,371	
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$144	
26	**Total** dollars received from energy assistance programs:	$387,489	
27	**Total** dollars received from other sources (private organizations):	$0	
28	**Total** Revenue from sales to residential accounts:	$2,948,298	
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$15	
30	*Intentionally Blank*		
31	**Total** residential account write-offs due to uncollectible:	$161,146	

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected		*CWR period only*
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	0	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).		*CWR period only*
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	270	
38	# Accounts remaining disconnected	534	
	a) 1-30 days	289	
	b) 31-60 days	179	
	c) 61+ days	66	

[END]

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Monthly CWR May 2012.xls

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	May	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: May, 2012

1	Number of Residential Customer Accounts:	190,980	
2	Number of Past Due Residential Customer Accounts:	32,851	
3	Number of Cold Weather Protection Requests:		*CWR period only*

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:		*CWR period only*
5	*Intentionally Blank*		
6	Number of customer accounts granted reconnection request:	423	

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR May 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: May, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:			*CWR period only*
a)	Number of PS requests received			*CWR period only*
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:			*CWR period only*
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	7,433		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	1,529		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	1,529	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	1,529	1,529	

Monthly CWR May 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: May, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$3,987,257	
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$121	
26	**Total** dollars received from energy assistance programs:	$268,727	
27	**Total** dollars received from other sources (private organizations):	$0	
28	**Total** Revenue from sales to residential accounts:	$5,776,912	
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$30	
30	*Intentionally Blank*		
31	**Total** residential account write-offs due to uncollectible:	$158,702	

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected		*CWR period only*
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	0	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).		*CWR period only*
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	423	
38	# Accounts remaining disconnected	1,572	
	a) 1-30 days	1,098	
	b) 31-60 days	281	
	c) 61+ days	193	

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	June	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: June, 2012

1	Number of Residential Customer Accounts:	191,221	
2	Number of Past Due Residential Customer Accounts:	31,570	
3	Number of Cold Weather Protection Requests:		*CWR period only*

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:		*CWR period only*
5	*Intentionally Blank*		
6	Number of customer accounts granted reconnection request:		*CWR period only*

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR June 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: June, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:			*CWR period only*
a)	Number of PS requests received			*CWR period only*
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:			*CWR period only*
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	4,648		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	1,371		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	1,371	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	1,371	1,371	

Company: Minnesota Energy Resources People's Natural Gas for report period ending: June, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$3,454,707	
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$109	
26	**Total** dollars received from energy assistance programs:	$119,153	
27	**Total** dollars received from other sources (private organizations):	$0	
28	**Total** Revenue from sales to residential accounts:	$1,315,315	
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$7	
30	*Intentionally Blank*		
31	**Total** residential account write-offs due to uncollectible:	$212,391	

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected		*CWR period only*
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	0	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).		*CWR period only*
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	590	
38	# Accounts remaining disconnected	2,322	
	a) 1-30 days	826	
	b) 31-60 days	1,037	
	c) 61+ days	459	

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	July	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: July, 2012

1	Number of Residential Customer Accounts:	190,719	
2	Number of Past Due Residential Customer Accounts:	26,948	
3	Number of Cold Weather Protection Requests:		*CWR period only*

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:		*CWR period only*
5	*Intentionally Blank*		
6	Number of customer accounts granted reconnection request:		*CWR period only*

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR July 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: July, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:			*CWR period only*
a)	Number of PS requests received			*CWR period only*
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:			*CWR period only*
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	2,356		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	1,314		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	1,314	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	1,314	1,314	

Monthly CWR July 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: July, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$2,732,589	
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$101	
26	**Total** dollars received from energy assistance programs:	$14,781	
27	**Total** dollars received from other sources (private organizations):	$1,931	
28	**Total** Revenue from sales to residential accounts:	$2,939,455	
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$15	
30	*Intentionally Blank*		
31	**Total** residential account write-offs due to uncollectible:	$148,935	

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected		*CWR period only*
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	0	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).		*CWR period only*
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	673	
38	# Accounts remaining disconnected	2,754	
	a) 1-30 days	649	
	b) 31-60 days	792	
	c) 61+ days	1,313	

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	August	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: August, 2012

1	Number of Residential Customer Accounts:	190,924	
2	Number of Past Due Residential Customer Accounts:	22,051	
3	Number of Cold Weather Protection Requests:		*CWR period only*

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:		*CWR period only*
5	*Intentionally Blank*		
6	Number of customer accounts granted reconnection request:		*CWR period only*

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR August 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: August, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:			*CWR period only*
a)	Number of PS requests received			*CWR period only*
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:			*CWR period only*
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	1,416		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	514		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	514	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	514	514	

Monthly CWR August 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: August, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$2,178,140	
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$99	
26	**Total** dollars received from energy assistance programs:	$169	
27	**Total** dollars received from other sources (private organizations):	$0	
28	**Total** Revenue from sales to residential accounts:	$3,271,495	
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$17	
30	*Intentionally Blank*		
31	**Total** residential account write-offs due to uncollectible:	$133,246	

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected		*CWR period only*
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	0	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).		*CWR period only*
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	503	
38	# Accounts remaining disconnected	2,671	
	a) 1-30 days	142	
	b) 31-60 days	507	
	c) 61+ days	2,022	

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	September	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: September, 2012

1	Number of Residential Customer Accounts:	190,340	
2	Number of Past Due Residential Customer Accounts:	21,207	
3	Number of Cold Weather Protection Requests:		*CWR period only*

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:		*CWR period only*
5	*Intentionally Blank*		
6	Number of customer accounts granted reconnection request:		*CWR period only*

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR September 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: September, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:			*CWR period only*
a)	Number of PS requests received			*CWR period only*
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:			*CWR period only*
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	961		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	269		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	269	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	269	269	

Company: Minnesota Energy Resources People's Natural Gas for report period ending: September, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$1,958,867	
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$92	
26	**Total** dollars received from energy assistance programs:	$0	
27	**Total** dollars received from other sources (private organizations):	$0	
28	**Total** Revenue from sales to residential accounts:	$3,514,489	
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$18	
30	*Intentionally Blank*		
31	**Total** residential account write-offs due to uncollectible:	$134,318	

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected	215	
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	215	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).		*CWR period only*
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	577	
38	# Accounts remaining disconnected	2,191	
	a) 1-30 days	46	
	b) 31-60 days	110	
	c) 61+ days	2,035	

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	October	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: October, 2012

1	Number of Residential Customer Accounts:	191,264
2	Number of Past Due Residential Customer Accounts:	18,428
3	Number of Cold Weather Protection Requests:	2,639

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	*Intentionally Blank*	
6	Number of customer accounts granted reconnection request:	1,218

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Monthly CWR October 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: October, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0		
a)	Number of PS requests received	2,639		
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:	2,639		
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	1,114		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	152	14	
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	152	14	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	152	166	

Monthly CWR October 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: October, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$1,679,811
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$91
26	**Total** dollars received from energy assistance programs:	$0
27	**Total** dollars received from other sources (private organizations):	$0
28	**Total** Revenue from sales to residential accounts:	$6,481,289
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$34
30	*Intentionally Blank*	
31	**Total** residential account write-offs due to uncollectible:	$77,856

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected	131	
	d) # Gas - heat not affected		*CWR period only*
	e) **Total** # disconnected	131	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	131	
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	1,218
38	# Accounts remaining disconnected	950
	a) 1-30 days	32
	b) 31-60 days	41
	c) 61+ days	877

[END]

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Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	November	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: November, 2012

1	Number of Residential Customer Accounts:	191,497
2	Number of Past Due Residential Customer Accounts:	19,781
3	Number of Cold Weather Protection Requests:	629

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	1
5	*Intentionally Blank*	
6	Number of customer accounts granted reconnection request:	289

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

Company: Minnesota Energy Resources People's Natural Gas for report period ending: November, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	1	
a)	Number of PS requests received	629	
17	*Intentionally Blank*		
18	Number of PS negotiations mutually agreed upon:	629	
19	*Intentionally Blank*		

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	1,419		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	15		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	15	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	15	15	

Monthly CWR November 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: November, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$1,823,628
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$92
26	**Total** dollars received from energy assistance programs:	$399,578
27	**Total** dollars received from other sources (private organizations):	$0
28	**Total** Revenue from sales to residential accounts:	$13,255,927
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$69
30	*Intentionally Blank*	
31	**Total** residential account write-offs due to uncollectible:	$70,034

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected	8	
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	8	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).	8	
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	289
38	# Accounts remaining disconnected	563
	a) 1-30 days	3
	b) 31-60 days	30
	c) 61+ days	530

[END]

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CWR Monthly December 2012.xls

Minnesota Public Utilities Commission

Minnesota Cold Weather Rule Compliance Questionnaire ***Version 3***

Company Submitting Reply:	Minnesota Energy Resources People's Natural Gas	*Required*
Reporting Year:	2012	*Required*
Reporting Period:	December	*Required*

Utility Monthly Reports (216B.091)

Company: Minnesota Energy Resources People's Natural Gas for report period ending: December, 2012

1	Number of Residential Customer Accounts:	191,963
2	Number of Past Due Residential Customer Accounts:	20,338
3	Number of Cold Weather Protection Requests:	476

RECONNECTION AT BEGINNING OF COLD WEATHER MONTHS

4	Number of "Right to Appeal" notices mailed to customers:	0
5	*Intentionally Blank*	
6	Number of customer accounts granted reconnection request:	96

INABILITY TO PAY (ITP) *This entire section intentionally left blank*

10% PLAN (TPP) *This entire section intentionally left blank*

CWR Monthly December 2012.xls

Company: Minnesota Energy Resources People's Natural Gas for report period ending: December, 2012

PAYMENT SCHEDULE (PS)

16	Number of "Right to Appeal" notices mailed to customers:	0		
a)	Number of PS requests received	476		
17	*Intentionally Blank*			
18	Number of PS negotiations mutually agreed upon:	476		
19	*Intentionally Blank*			

DISCONNECTIONS

20	Number of disconnection notices mailed to customers:	3,866		
21	Number of customer accounts disconnected who did not seek protection:			
	Duplicate columns for use in April and October			
	April 1-15 and October 1-15 in 1st column			
	April 16-30 and October 16-31 in 2nd column			
	All other months, use 1st column only			
a)	# Electric - heat affected			*Required*
b)	# Electric - heat not affected			*Required*
c)	# Gas - heat affected	14		
d)	# Gas - heat not affected			*Required*
e)	**Total** # disconnected	14	0	
22	Number of customer accounts disconnected seeking protection:			
a)	# Electric - heat affected			*CWR period only*
b)	# Electric - heat not affected			*CWR period only*
c)	# Gas - heat affected			*CWR period only*
d)	# Gas - heat not affected			*CWR period only*
e)	Total # disconnected (See Note)	0		
23	Number of customer accounts disconnected for nonpayment (auto-calculation of #21e+ #22e):	14	14	

Company: Minnesota Energy Resources People's Natural Gas for report period ending: December, 2012

DOLLAR VALUE

24	**Total** dollars past due on all residential accounts:	$2,130,546	
25	**Average** past due dollar amount per past due account (auto-calculation of #24 ÷ #2):	$105	
26	**Total** dollars received from energy assistance programs:	$562,213	
27	**Total** dollars received from other sources (private organizations):	$0	
28	**Total** Revenue from sales to residential accounts:	$20,067,497	
29	**Average** monthly residential bill: (auto-calculation of #28 ÷ #1)	$105	
30	*Intentionally Blank*		
31	**Total** residential account write-offs due to uncollectible:	$71,818	

DISCONNECTION DURATION

32	Number of customer accounts disconnected 24 hours or more:		
	a) # Electric - heat affected		*CWR period only*
	b) # Electric - heat not affected		*CWR period only*
	c) # Gas - heat affected	8	
	d) # Gas - heat not affected		*CWR period only*
	e) Total # disconnected	8	
33	*Intentionally Blank*		
34	Number occupied heat-affected accounts disconnected 24 hours or more (to include customers who did and did not seek protection).		*CWR period only*
35	*Intentionally Blank*		
36	*Intentionally Blank*		

RECONNECTION DATA

37	# Accounts reconnected	96	
38	# Accounts remaining disconnected	422	
	a) 1-30 days	3	
	b) 31-60 days	2	
	c) 61+ days	417	

[END]

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Service extension requests

2012	**Residential**		**Commercial**			**Existing**				
	new Installs	Avg time between requested date and install	New Installs	Avg time between requested date and install	# of existing residential requested	# residential completed as requested	residential average days between request and completion	# of existing commercial requested	# commercial completed as requested	commercial average days between request and completion
January	26	7	12	17	422	418	1	39	38	1
February	16	27	1	78	393	392	1	28	28	0
March	61	26	2	35	365	364	1	20	20	0
April	123	20	8	61	465	461	1	22	22	0
May	133	23	16	29	572	571	1	27	27	0
June	164	21	9	21	637	633	1	23	23	0
July	164	18	12	52	625	624	1	26	26	0
August	237	24	14	37	831	829	1	35	35	0
September	275	19	29	27	1087	1084	1	61	61	0
October	272	18	16	36	1469	1460	1	149	149	0
November	170	9	14	11	831	821	1	113	113	0
December	37	2	7	0	538	534	1	64	64	0

	JANUARY				FEBRUARY			
# OF COMPLAINTS	54				369			
	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class
Employee Action / Behavior Issue			3	5.55%	2	0.54%	12	3.25%
Billing / Meter Read Issue			11	20.37%	4	1.08%	41	11.11%
Collection / Disconnection Issue			4	7.41%	4	1.08%	60	16.26%
Service Quality			11	20.37%	2	0.54%	69	18.70%
Meter Adjustment			2					
Outage								
My bill is too high			9	16.67%	9	2.44%	75	20.33%
Service Restoration Intervals							1	0.27%
Service Extension Intervals								
Others	2	3.70%	12	22.22%	6	1.63%	84	22.76%
TIME TO RESOLVE COMPLAINT								
Initially	48				313			
Within 10 days	2				48			
> 10 days	4				8			
	# resolved by taking listed action		% resolved by taking listed action		# resolved by taking listed action		% resolved by taking listed action	
Complaint Resolution								
Taking action as customer request	16		29.63%		160		43.36%	
Agreeable Compromise	26		48.15%		128		34.69%	
Not within the control of the Utility	7		12.96%		17		4.61%	
Refuse	5		9.26%		64		17.34%	
PUC COMPLAINTS			7				3	

	MARCH				APRIL			
# OF COMPLAINTS	251				219			
	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class
Employee Action / Behavior Issue	1	0.40%	13	5.18%			7	3.20%
Billing / Meter Read Issue	2	0.80%	41	16.33%	6	2.74%	21	9.59%
Collection / Disconnection Issue	3	1.20%	27	10.76%	2	0.91%	25	11.42%
Service Quality	2	0.80%	43	17.13%			30	13.70%
Meter Adjustment								
Outage			1	0.40%				
My bill is too high	4	1.60%	48	19.12%	2	0.91%	45	20.55%
Service Restoration Intervals							1	0.46%
Service Extension Intervals								
Others	4	1.60%	62	24.70%	3	1.37%	77	35.16%
TIME TO RESOLVE COMPLAINT								
Initially	220				208			
Within 10 days	30				6			
> 10 days	1				5			
Complaint Resolution	# resolved by taking listed action		% resolved by taking listed action		# resolved by taking listed action		% resolved by taking listed action	
Taking action as customer request	101		40.23%		100		45.66%	
Agreeable Compromise	104		41.43%		91		41.55%	
Not within the control of the Utility	4		1.59%		2		0.91%	
Refuse	42		16.73%		26		11.87%	
PUC COMPLAINTS			3				2	

	MAY				JUNE			
# OF COMPLAINTS	122				113			
	# of complaints for Comercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class
Employee Action / Behavior Issue							6	5.31%
Billing / Meter Read Issue	2	1.64%	10	8.19%			10	8.85%
Collection / Disconnection Issue	1	0.82%	22	18.03%	1	0.88%	21	18.58%
Service Quality			26	21.31%			33	29.20%
Meter Adjustment								
Outage								
My bill is too high	3	2.46%	14	11.48%	2	1.77%	7	6.19%
Service Restoration Intervals								
Service Extension Intervals								
Others	1	0.82%	43	35.25%			33	29.20%
TIME TO RESOLVE COMPLAINT				5				2
Initially	108				107			
Within 10 days	13				4			
> 10 days	1				2			
	# resolved by taking listed action		% resolved by taking listed action		# resolved by taking listed action		% resolved by taking listed action	
Complaint Resolution								
Taking action as customer request	47		38.52%		33		29.20%	
Agreeable Compromise	48		39.34%		35		30.97%	
Not within the control of the Utility	2		1.64%		4		3.54%	
Refuse	25		24.49%		41		36.28%	
PUC COMPLAINTS								

	JULY				AUGUST			
# OF COMPLAINTS	126				144			
	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class
Employee Action / Behavior Issue			1	0.79%			4	2.78%
Billing / Meter Read Issue			8	6.34%	2	1.39%	9	6.25%
Collection / Disconnection Issue			20	15.87%	4	2.78%	26	18.06%
Service Quality	2	1.59%	48	38.09%	2	1.39%	33	22.92%
Meter Adjustment			4					
Outage								
My bill is too high	1	0.0.79%	8	6.34%	2	1.39%	7	4.86%
Service Restoration Intervals							2	1.39%
Service Extension Intervals					1	0.69%		
Others	1	0.79%	33	26.19%	1	0.69%	51	35.42%
TIME TO RESOLVE COMPLAINT				7				2
Initially	112				135			
Within 10 days	13				7			
> 10 days	1				2			
	# resolved by taking listed action		% resolved by taking listed action		# resolved by taking listed action		% resolved by taking listed action	
Complaint Resolution								
Taking action as customer request	30		23.81%		40		27.78%	
Agreeable Compromise	49		38.89%		50		34.72%	
Not within the control of the Utility	4		3.17%		8		5.56%	
Refuse	43		34.13%		46		31.94%	
PUC COMPLAINTS								

	SEPTEMBER				OCTOBER			
# OF COMPLAINTS	149				139			
	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class
Employee Action / Behavior Issue			3	2.01%			3	2.16%
Billing / Meter Read Issue	3	2.01%	20	13.42%	1	0.72%	14	10.07%
Collection / Disconnection Issue	3	2.01%	29	19.46%	3	2.16%	13	9.35%
Service Quality	1	0.67%	35	23.49%			56	40.29%
Meter Adjustment								
Outage								
My bill is too high	1	0.67%	5	3.36%	1	0.72%	4	2.88%
Service Restoration Intervals			1	0.67%				
Service Extension Intervals							1	0.72%
Others	2	1.34%	46	30.87%	3	2.16%	40	28.78%
TIME TO RESOLVE COMPLAINT				2				2
Initially	139				130			
Within 10 days	7				6			
> 10 days	3				3			
Complaint Resolution	# resolved by taking listed action		% resolved by taking listed action		# resolved by taking listed action		% resolved by taking listed action	
Taking action as customer request	54		36.24%		52		37.41%	
Agreeable Compromise	57		38.26%		56		40.29%	
Not within the control of the Utility								
Refuse	38		25.50%		31		22.30%	
PUC COMPLAINTS								

	NOVEMBER				DECEMBER			
# OF COMPLAINTS	99				119			
	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class	# of complaints for Commercial Class	% of complaints for Commercial Class	# of complaints for Residential Class	% of complaints for Residential Class
Employee Action / Behavior Issue			3	3.03%			2	1.68%
Billing / Meter Read Issue			10	10.10%			18	15.13%
Collection / Disconnection Issue			12	12.12%			29	24.40%
Service Quality	1	1.01%	28	28.28%	2	1.68%	20	16.81%
Meter Adjustment								
Outage								
My bill is too high	1	1.01%	3	3.03%	3	2.52%	4	3.36%
Service Restoration Intervals			1	1.01%				
Service Extension Intervals							1	0.84%
Others	5	5.05%	35	35.35%	7	5.88%	33	27.73%
TIME TO RESOLVE COMPLAINT				3				2
Initially	91				83			
Within 10 days	6				1			
> 10 days	2				35			
	# resolved by taking listed action		% resolved by taking listed action		# resolved by taking listed action		% resolved by taking listed action	
Complaint Resolution								
Taking action as customer request	37		37.37%		37		31.09%	
Agreeable Compromise	45		45.45%		60		50.42%	
Not within the control of the Utility								
Refuse	17		17.17%		22		18.49%	
PUC COMPLAINTS								

Answer time for gas emergency phone lines

2012	January	February	March	April	May	June	July	August	September	October	November	December	AVERAGE	TOTAL
Total calls	1,628	1,312	1,235	1,244	1,339	1,279	1,337	1,317	1,401	1,720	1,912	1,617	1445	17,341
Average speed of answer	7	7	7	6	7	7	7	7	5	6	9	7	6.8	
% answered in 15 seconds	90.57%	91.39%	91.41%	92.96%	92.33%	92.81%	93.78%	92.71%	94.28%	95.20%	89.07%	91.46%	92.3%	

Tech Response Time From Time of Call to Arrival

	January	February	March	April	May	June	July	August	September	October	November	December	Total
Calls responded to in Under 1 hour	491	387	404	401	433	409	426	448	572	610	676	503	5760
Calls responded to in Over 1 hour	29	17	20	23	26	25	23	31	17	23	204	23	461
Total Calls	**520**	**404**	**424**	**424**	**459**	**434**	**449**	**479**	**589**	**633**	**880**	**526**	6221

Calls responded to in Under 1 hour

	NW region	NE region	CN region	SE region	SW region	Total
January	48	85	110	179	69	**491**
February	52	70	85	136	44	**387**
March	55	70	93	141	45	**404**
April	36	83	88	145	49	**401**
May	53	84	126	129	41	**433**
June	33	114	85	127	50	**409**
July	47	95	80	157	47	**426**
August	52	85	109	157	45	**448**
September	76	116	127	167	86	**572**
October	79	111	134	207	79	**610**
November	54	105	239	205	73	**676**
December	45	82	171	153	52	**503**
Totals	630	1100	1447	1903	680	5760

MERC Average emergency response time in minutes	Month
January	0.28.33
February	0.26.58
March	0.27.48
April	0.27.46
May	0.29.28
June	0.28.44
July	0.28.22
August	0.28.32
September	0.28.12
October	0.26.37
November	0.49.59
December	0.29.07
YTD Average 2012	0:30:00

Calls responded to in Over 1 hour

	NW region	NE region	CN region	SE region	SW region	Total
January	7	4	10	3	5	**29**
February	6	1	1	4	5	**17**
March	7	0	2	5	6	**20**
April	7	0	8	4	4	**23**
May	7	2	9	2	6	**26**
June	5	6	2	7	5	**25**
July	14	1	4	0	4	**23**
August	9	3	6	7	6	**31**
September	6	4	1	1	5	**17**
October	7	5	3	2	6	**23**
November	7	4	182	8	3	**204**
December	7	2	6	1	7	**23**
Totals	89	32	234	44	62	461

MERC's emergency response time target is 30 minutes

***note: Central increase in Nov due to propane plant release resulting in over 300 leak calls**

Emergency reponse time													
2012													
	January	February	March	April	May	June	July	August	September	October	November	December	Total
Total calls	520	404	424	424	459	434	449	479	589	633	880	526	6221
# responded to in < 1 hour	491	387	404	401	433	409	426	448	572	610	676	503	5760
% responded to in < 1 hour	94.4%	95.8%	95.3%	94.6%	94.3%	94.2%	94.9%	93.5%	97.1%	96.4%	76.8%	95.6%	92.6%
# responded to in > 1 hour	29	17	20	23	26	25	23	31	17	23	204	23	461
% responded to in > 1 hour	5.9%	4.4%	5.0%	5.7%	6.0%	6.1%	5.4%	6.9%	3.0%	3.8%	30.2%	4.6%	7.4%
Average minutes to respond	29	27	28	28	29	29	28	29	28	27	50	29	30

***note: Central increase in Nov due to propane plant release resulting in over 300 leak calls**

Mislocates

2012

	January	February	March	April	May	June	July	August	September	October	November	December	TOTAL
Total locates	1561	856	2080	5624	9090	9480	8383	9579	4242	7976	9294	2831	70996
Mislocates	0	0	0	0	1	3	4	5	4	2	3	2	24
% mislocated	0.000%	0.000%	0.000%	0.000%	0.011%	0.032%	0.048%	0.052%	0.094%	0.025%	0.032%	0.071%	0.034%

Gas lines damaged

2012	January	February	March	April	May	June	July	August	September	October	November	December	Total
Total	1	0	4	18	8	12	31	26	30	18	15	11	174
Fault of Company employee or company contractor	0	0	1	2	1	3	5	8	3	2	3	4	32
damage by others	1	0	3	16	7	9	26	18	27	16	12	7	142
System issue	0	0	0	0	0	0	0	0	0	0	0	0	0
Miles of Pipe as of 12/31/12	4,453	4,453	4,453	4,453	4,453	4,453	4,453	4,453	4,453	4,453	4,453	4,453	4,453
Damage per 100 miles of pipe													
Under the control of MERC Employees													0.71
Caused by all others													3.19

Gas lines damaged

2012

DATE	Address	Outage caused by system issue	outage caused by MERC employee or MERC contractor	outage caused by other	Number of customer affected	outage duration/minutes	Lost Gas Billed/Mcf
JANUARY							
1/5/2012	133 2nd Ave Worthington	N	N	Y	2	15	0.00
1/7/2012	120 N Dugan Welcome	N	N	Y	1	1200	8.19
1/19/2012	125 Center St Oronoco	N	N	Y	1	549	24.60
FEBRUARY							
MARCH							
3/20/2012	4916 Whispering Way Eagan	N	N	Y	1	15	9.06
3/27/2012	3355 Discovery Rd Eagan	N	N	Y	1	20	0.00
3/8/2012	13 South St Dodge Center	N	N	Y	1	96	4.97
3/19/2012	913 17th Ave NE Rochester	N	N	Y	1	60	0.57
3/29/2012	301 2nd St NW Kasson	N	N	Y	2	80	0.00
APRIL							
4/1/2012	428 Superior Ave Crosby	N	N	Y	1	300	0.16
4/2/2012	105 S Main Dover	N	N	Y	1	20	0.00
4/9/2012	221 7th St NW Rochester	N	N	Y	1	120	0.18
4/20/2012	1201 S Broadway Rochester	N	N	Y	3	60	0.72
4/11/2012	432 N Rebecca Ivanhow	N	N	Y	1	780	0.06
4/26/2012	15 W Front St Cottonwoood	N	N	Y	1	35	0.51
4/30/2012	310 Brown St Jackson	N	N	Y	1	1311	32.78
4/16/2012	39545 Government Rd Hinckley	N	N	Y	1	45	4.34
4/24/2012	850 Hwy 65 S Mora	N	N	Y	1	30	2.07
4/5/2012	21547 Harvest Hills Prior Lake	N	N	Y	1	90	4.65
4/24/2012	20195 Holyoke Ave Lakeville	N	N	Y	1	60	74.40
4/26/2012	123 NE 7th St Grand Rapids	N	N	Y	1	20	0.19
4/30/2012	50940Miller Highway Hermantown	N	N	Y	100	540	1.24
MAY							
5/15/2012	215 Highway 56 Hayfield	N	N	Y	1	93	2.46
5/26/2012	1619 Wishire Ct NE Rochester	N	N	Y	1	150	0.72

5/25/2012	418 E Eyota St Dover	N	N	Y	6	120	0.00
5/7/2012	350 S Edquist Appleton	N	N	Y	1	15	0.26
5/30/2012	507 S Hwy Jackson	N	Y	N	1	30	0.72
5/18/2012	940 W 4th St Rush City	N	N	Y	1	60	0.00
5/5/2012	1301 Trapp Rd Eagan	N	N	Y	1	15	7.57
5/30/2012	15100 Cty Rd 23 Verndale	N	N	Y	1	160	0.46
5/2/2012	1237 Lake Ave Detroit Lakes	N	N	Y	1	60	2.15
5/16/2012	719 19th St NW Bemidji	N	N	Y	1	10	2.87
JUNE							
6/1/2012	312 N 4th Ave Biwabik	N	N	Y	1	30	0.27
6/28/2012	100 Block E Main Ada	N	N	Y	1	20	0.00
6/25/2012	3259 Terminal Dr Eagan	N	N	Y	1	135	144.85
6/28/2012	5204 Oriole Dr Farmington	N	N	Y	1	15	4.65
6/26/2012	27920 Danville Ave Castle Rock	N	N	Y	1	190	148.80
6/24/2012	1654 Hickory Ln Eagan	N	N	Y	4	180	29.52
6/5/2012	2700 Schaeffer Ln NE Rochester	N	N	Y	1	60	5.36
6/4/2012	626 Chalet Dr Rochester	N	Y	N	1	60	1.12
6/12/2012	532 Willow Bend Ln SW Rochester	N	N	Y	2	40	24.16
6/20/2012	1104 6th Ave NW Rochester	N	Y	N	1	60	8.58
6/16/2012	6810 Chester Heights Rochester	N	N	Y	1	30	1.12
6/12/2012	705 3rd Ave Windom	N	N	Y	1	20	8.96
6/26/2012	857 Hwy 12 Ortonville	N	N	Y	1	30	0.00
6/12/2012	205 3rd St E Canby	N	N	Y	1	50	16.40
JULY							
7/9/2012	992 Gary St Calumet	N	N	Y	1	30	0.21
7/1/2012	5668 Miller Hwy Pike Lake	N	N	Y	1	90	0.31
7/13/2012	3113 Cty Rd 112 International Falls	N	N	Y	1	15	3.10
7/14/2012	4846 Morris Thomas Rd Hermantown	N	N	Y	1	5	0.00
7/16/2012	19563 Gama Beach Rd Grand Rapids	N	N	Y	2	150	6.70
7/18/2012	18394 520th St Deer River	N	N	Y	1	30	8.04
7/18/2012	1531 E 3rd Ave International Falls	N	N	Y	1	27	6.20
7/26/2012	1407 E Hwy 2 Grand Rapids	N	N	Y	1	40	10.72
7/9/2012	123 Carlton Dr SW Rochester	N	N	Y	1	90	21.00
7/19/2012	300 3rd Ave NW Pine Island	N	N	Y	1	120	0.00
7/31/2012	25510 625th St Kasson	N	N	Y	1	5	1.34
7/25/2012	120 E Main west Concord	N	N	Y	1	240	5.25
7/9/2012	14155 Abbeyfield Ct Rosemount	N	N	Y	1	60	18.60
7/23/2012	3805 Windcrest Ct Eagan	N	N	Y	2	120	2.46

7/12/2012	3430 200th St W Farmington	N	N	Y	1	60	19.38
7/10/2012	37887 Lincoln Trail North Branch	N	N	Y	1	60	4.34
7/17/2012	5400 Oriole Dr Farmington	N	N	Y	1	15	4.02
7/18/2012	5417 Oriole Dr Farmington	N	N	Y	1	20	1.95
7/2/2012	2038 Knollwodd Dr Fairmont	N	N	Y	1	90	0.93
7/5/2012	1378 Springfield Pkwy Jackson	N	N	Y	1	143	32.75
7/3/2012	Weave & Cleveland Welcome	N	N	Y	7	60	14.58
7/9/2012	418 Weaver St Welcome	N	N	Y	9	1020	3.60
7/23/2012	216 1/2 Cleveland St Welcome	N	N	Y	1	60	0.80
7/24/2012	1208 River Rd Windom	N	N	Y	2	1020	45.80
7/12/2012	1156 River Rd Windom	N	N	Y	1	1200	0.24
7/24/2012	101 Shady Ln Jackson	N	N	Y	1	60	0.69
7/2/2012	111 Benjamin Jackson	N	N	Y	3	1140	111.90
7/20/2012	300 Block Hwy 9 Ada	N	N	Y	1	0	0.00
7/22/2012	1332 E Shore Dr Detroit Lakes	N	N	Y	2	20	4.65
7/23/2012	500 8th Ave Ironton	N	N	Y	1	0	0.00
7/31/2012	506 SE 7th Ave Roseau	N	N	Y	1	120	0.00
AUGUST		N	N	Y			
8/12/2012	609 18th St Cloquet	N	N	Y	1	120	8.67
8/16/2012	2014 Town Rd 416 Ranier	N	N	Y	1	5	1.55
8/17/2012	607 18th St Cloquet	N	N	Y	1	60	8.67
8/24/2012	Golf Course and Horseshoe Rd Cloquet	N	N	Y	74	245	30.20
8/8/2012	627 5th St SW Rochester	N	Y	N	1	60	4.29
8/8/2012	1408 Pahama Ct Rochester	N	Y	N	14	240	29.22
8/14/2012	7130 SE 30th St Rochester	N	N	Y	1	349	0.14
8/14/2012	1213 S Broadway Rochester	N	N	Y	1	90	0.10
8/21/2012	801 S Broadway Rochester	1	N	Y	1	180	0.46
8/15/2012	726 3rd St NW Rochester	N	N	Y	1	90	2.15
8/27/2012	30 Civic Center Dr Rochester	N	Y	N	1	30	17.19
8/30/2012	25055 608th St Mantorville	N	Y	N	1	20	5.36
8/1/2012	723 NW 2nd St Rochester	N	N	Y	1	360	2.86
8/9/2012	110 Center Ave S Hayfield	N	N	Y	2	345	160.08
8/2/2012	1392 Cleome Ln Eagan	N	Y	N	1	10	2.46
8/26/2012	350 Johnson Ave Pine City	N	N	Y	1	10	0.47
8/29/2012	1692 Covington Ln Eagan	N	N	Y	2	120	7.38
8/24/2012	669 Coventry Pkwy Eagan	N	N	Y	1	60	9.84
8/6/2012	14640 Diamond Path Rosemount	N	N	Y	1	120	22.92
8/15/2012	419 6th St Pine City	N	Y	N	2	150	6.76

8/7/2012	10005 205th St W Rosmeount	N	Y	N	1	30	1.17	
8/20/2012	1609 6th Ave Mountain Lake	N	N	Y	1	60	2.73	
8/6/2012	511 Main St Lamberton	N	N	Y	1	5	22.32	
8/27/2012	1429 6th Ave Mountain Lake	N	N	Y	1	60	3.20	
8/28/2012	1403 6th Ave Mountain Lake	N	N	Y	1	260	3.20	
SEPTEMBER								
9/4/2011	1108 Ugstad Rd Proctor	N	N	Y	3	35	173.60	
9/10/2012	715 17th St Int Falls	N	N	Y	1	120	7.75	
9/11/2012	1721 1st Ave E Int Falls	N	N	Y	1	30	9.30	
9/11/2012	1571 Airport Rd Cloquet	N	N	Y	1	240	0.00	
9/11/2012	609 18th St Cloquet	N	N	Y	1	90	0.00	
9/14/2012	106 Sharon St Buhl	N	N	Y	1	60	4.02	
9/20/2012	444 3rd St Int Falls	N	N	Y	2	115	0.29	
9/5/2012	10 9 1/2 St SE Rochester	N	Y	N	3	42	6.01	
9/8/2012	218 N Chatfield St Dover	N	N	Y	267	390	39.60	
9/14/2012	100 9th St SE Kasson	N	N	Y	1	96	5.78	
9/14/2012	1355 East Ln LaCrescent	N	N	Y	3	90	33.21	
9/14/2012	2nd St & 9Th Ave Rochester	N	N	Y	19	45	11.46	
9/8/2012	955 21st SE Rochester	N	N	Y	1	120	1.08	
9/11/2012	723 2nd St NW Rochester	N	N	Y	1	60	0.54	
9/28/2012	1117 E Caledonia St Caledonia	N	N	Y	1	510	5.54	
9/4/2012	17280 Sunset Trail Pine City	N	N	Y	1	5	0.00	
9/8/2012	8896 197th St Lakeville	N	N	Y	1	60	4.65	
9/9/2012	11300 235th St E Lakeville	N	N	Y	1	105	7.75	
9/12/2012	313 Walnut St Farmington	N	N	Y	1	60	10.20	
9/6/2012	1696 Woodgate Ln Eagan	N	Y	N	2	60	2.46	
9/19/2012	213 Cleveland Welcome	N	N	Y	1	45	0.40	
9/25/2012	1317 2nd Ave Mountain Lake	N	N	Y	1	60	24.40	
9/27/2012	908 Milwaukee Lakefield	N	N	Y	1	1080	77.50	
9/15/2012	213 Elm St Tracy	N	N	N	1			House destroyed
OCTOBER								
10/11/2012	315 SE 1st St Grand Rapids	N	N	Y	1	15	0.29	
10/22/2012	301 3rd St Nashwauk	N	Y	N	1	60	0.00	
10/31/2012	34336 Chestnut Cir Moos Lake	N	N	Y	1	30	0.27	
10/3/2012	61057 252nd Ave Mnatorville	N	N	Y	1	90	7.44	
10/24/2012	200 2nd St Claremont	N	N	Y	1	75	0.06	
10/19/2012	2003 NE Parkwood Hills Dr Rochester	N	N	Y	1	240	1.08	
10/17/2012	116 E Main Hayfield	N	N	Y	1	65	17.18	

10/2/2012	1317 2nd Ave Mt Lake	N	N	Y	1	15	2.70
10/4/2012	1313 2nd Ave Mt Lake	N	N	Y	1	15	2.70
10/9/2012	401 Milwaukee Lakefield	N	N	Y	1	60	1.10
10/22/2012	262 State St Jackson	N	N	Y	1	420	0.51
10/6/2012	9596 Main St Elko	N	N	Y	1	60	1.17
10/13/2012	14429 565th St West Concord	N	N	Y	1	10	0.47
10/9/2012	3500 Dodd Rd Eagan	N	Y	N	1	90	128.76
10/12/2012	190 Shorewood Detroit Lakes	N	N	Y	1	15	4.65
10/2/2012	23402 Cross Dr Deerwood	N	N	Y	1	68	18.22
NOVEMBER							
11/1/2012	87 Outer Dr Silver Bay	N	Y	N	1	20	0.00
11/13/2012	702 NE 9th Ave Grand Rapids	N	N	Y	1	100	2.68
11/30/2012	1504 Edge Dr Cloquet	N	N	Y	1	150	0.78
11/6/2012	839 5th Ave SE Rochester	N	Y	N	1	60	0.14
11/13/2012	2138 Gemini Dr SW Rochester	N	N	Y	1	90	1.55
11/27/2012	416 State St West Concord	N	N	Y	1	315	22.03
11/1/2012	235 State St Jackson	N	N	Y	1	960	109.89
11/23/2012	37303 600th Ave Mt Lake	N	N	Y	1	60	39.41
11/8/2012	132 2nd St NE Crosby	N	Y	N	1	90	0.00
DECEMBER							
12/5/2012	1308 Hwy 33 Cloquet	N	N	Y	1	480	515.04
12/4/2012	2930 146th St W Rosemount	N	N	Y	1	120	0.00
12/4/2012	4462 Dodd Rd Eagan	N	N	Y	1	15	0.00
12/4/2012	24232 Pillsbury Lakeville	N	N	Y	1	150	304.50

Service interruptions

2012	January	February	March	April	May	June	July	August	September	October	November	December	Total
Total	3	0	5	13	10	14	31	25	23	16	9	4	153
System Integrity	0	0	0	0	0	0	0	0	0	0	0	0	0
Company employee or company contractor damage	0	0	0	0	1	2	0	7	2	2	3	0	17
caused by other	3	0	5	13	9	12	31	18	21	14	6	4	136

2012

DATE	Address	Outage caused by system issue	outage caused by MERC employee or MERC contractor	outage caused by other	Number of customers affected	outage duration	comments
1/19/2012	125 E Center Oronoco	N	N	Y	1	9.15 hours	vehicle ran off the road and hit a residential meter
5/18/2012	Cloquet	N	N	Y	2	0	Transmission pipeline experienced low pressure. Only 2 customers affected had alernate fuel source.
6/26/2012	27920 Danville Ave Castle Rock	N	N	Y	1	3.16	Service line severed, excavator had not requested a locate.
7/3/2012	Rochester International Airport	N	N	N	0	0	The service to the airport has it's own odorizer. During low load periods "slugging" can occur. Slugging is where odorant pools and eventually passes through the line. The liquid odorant can be easily detected through any of the gas burners. This is what occurred resulting in the the fire department evacuating the airport.
8/13/2012	1771 Yankee Doodle Rd Eagan	Y	N	N	0	0	Measurement Tech was testing large volume meter. When tech went to trun the inlet valve on the valve failed (broke). 2 buildings were evacuated while the valve was being replaced.
9/10/2012	218 N Chatfield St Dover	N	N	Y	267	390	Contractor severed main feed serving Dover, requiring turning gas off to the town. The contractor was determined to be at fault.
9/11/2012	1571 Airport Rd Cloquet	N	N	Y	1	240	Contractor severed service line to nursing home, resulting in the nursing home being evacuated. The contractor was determined to be at fault.
9/15/2012	213 Elm St Tracy	N	N	N	1		Home destroyed due to explosion. Investigation on-going.
12/6/2012	20802 Kensington Blvd Lakeville	N	N	N	0	0	200 people evacuated from commercial building by business management. No gas in building, only 3 small leaks were found.

O&M expenses FERC Account 901 and 903 plus payroll taxes and benefits

2012													
	January	February	March	April	May	June	July	August	September	October	November	December	Total
	$ 550,986	$ 454,909	$ 642,276	$ 549,033	$ 513,547	$ 522,441	$ 485,439	$ 488,944	$ 474,394	$ 753,406	$ 393,197	$ 580,755	$ 6,409,328

	901000	903000	
Jan-13	$ 38,652	$ 512,335	
Feb-13	$ 54,616	$ 400,293	
Mar-13	$ 50,879	$ 591,397	
Apr-13	$ 16,416	$ 532,618	
May-13	$ 35,304	$ 478,243	
Jun-13	$ 33,300	$ 489,141	
Jul-13	$ 33,505	$ 451,934	
Aug-13	$ 38,405	$ 450,538	
Sep-13	$ 53,248	$ 421,147	
Oct-13	$ 59,593	$ 693,813	
Nov-13	$ 43,001	$ 350,196	
12-Dec	$ 48,223	$ 532,532	
	$ 505,142	$ 5,904,186	$ 6,409,328

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Kristin M. Stastny hereby certifies that on the 1st day of May, 2013, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of MERC's Service Quality Report on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

/s/ Kristin M. Stastny
Kristin M. Stastny

Subscribed and sworn to before me
this 1st Day of May, 2013.

/s/ Paula Bjorkman
Notary Public, State of Minnesota

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Michael	Bradley	bradleym@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Daryll	Fuentes	N/A	USG	550 W. Adams Street Chicago, IL 60661	Paper Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Amber	Lee	lee.amber@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List

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Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW Rochester, MN 55901	Electronic Service	No	GEN_SL_Minnesota Energy Resources Corporation_General Service List

DORSEY
DORSEY & WHITNEY LLP

MICHAEL J. AHERN
(612) 340-2881
FAX (612) 340-2643
ahern.michael@dorsey.com

July 8, 2013

VIA ELECTRONIC FILING
Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

Re: Minnesota Energy Resources Corporation's (MERC's) 2012 Annual Service Quality Report (Report)
Docket No. G007, 011/M-13-355
Reply Comments

Dear Dr. Haar:

On June 27, 2013, the Department of Commerce, Division of Energy Resources filed Comments recommending that the Minnesota Public Utilities Commission (Commission) accept MERC's Report pending the provision of additional information in MERC's Reply Comments. The specific information the Department requested is provided in detail in the following pages.

Thank you for your attention to this matter.

Sincerely yours,

/s/ Michael J. Ahern

Michael J. Ahern

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
J. Dennis O'Brien	Commissioner
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Betsy Wergin	Commissioner

In the Matter of the Review of Minnesota Energy Resources Corporation's (MERC's) 2012 Annual Service Quality Report	Docket No. G007, 011/M-13-355

REPLY COMMENTS OF MINNESOTA ENERGY RESOURCES CORPORATION

Minnesota Energy Resources Corporation (MERC) submits the attached Reply Comments in response to the June 27, 2013, Minnesota Department of Commerce, Division of Energy Resources (Department) Comments in this docket. In its Comments, the Department recommended that MERC provide additional information in its Reply Comments, specifically:

A. an explanation for the large increase in meters not read for 6-12 months at the end of 2012;

B. an explanation detailing why the average commercial installation time increased from 2011 to 2012 and why April's average commercial response time was significantly longer than other months in 2012;

C. a full explanation of why meter adjustment and service quality complaints increased between 2011 and 2012. Specifically, MERC should address whether the increase in complaints, in particular service quality, resulted from additional changes in how the Company classifies complaints or whether those complaints are due to operational or other issues;

D. a full explanation as to why the percentage of complaints resolved upon initial inquiry decreased from 2011 to 2012. Specifically, MERC should address whether the decrease

in complaints resolved upon initial inquiry was due changes in the way the Company processes disputes or whether the increase was due to some other issue;

E. a copy of MERC's May 1, 2012 customer complaint report required by Minnesota Rule 7820.0500

F. a detailed explanation of each unusual service interruption, as defined in the Department's comments on the Company's 2011 Service Quality Report; including, what caused the service interruption and why the event impacted several customers or lasted for an extended period of time;

G. further information regarding the residential explosion that occurred on September 15, 2012 and updates on the status and findings of the investigation;

H. an explanation detailing why monthly O&M expenses in October 2012 were noticeably different than the monthly average.

Below, MERC discusses the additional information requested by the Department.

A. The large increase in meters not read for 6-12 months at the end of 2012

With the warmer than normal weather in 2012, MERC was able to perform the annual farm tap inspections earlier in the year, with the annual readings taken at the time of the inspection. Typically, these inspections are performed throughout the summer. With the readings being done earlier in the year, MERC experienced more accounts having 6-12 month reads. Farm tap accounts provide their own monthly readings with MERC being required to perform an annual read.

B. Why the average commercial installation time increased from 2011 to 2012 and why April's average commercial response time was significantly longer than other months in 2012

In reviewing these applications, it appears several of these requests — while ready for service — decided to wait until there was not a winter construction charge. The date was not updated which resulted in the appearance of service extensions being delayed.

C. Why meter adjustment and service quality complaints increased between 2011 and 2012. Specifically, whether the increase in complaints, in particular service quality, resulted from additional changes in how the Company classifies complaints or whether those complaints are due to operational or other issues

MERC initiated a new customer complaint tracking system late in 2011. Prior to that time, complaints to the Call Center were manually tracked and MERC felt not as accurate as a more automated process. Now the customer service representative needs to complete a pop up window before moving in the system. This consists of indicating whether the call is regarding a complaint and if so, what type of complaint. There is also an automated follow up that requires the customer service representative to provide the required reporting information. MERC does not believe there were any more particular types of complaints in 2012, but rather more accurate reporting.

D. Why the percentage of complaints resolved upon initial inquiry decreased from 2011 to 2012. Specifically, whether the decrease in complaints resolved upon initial inquiry was due changes in the way the Company processes disputes or whether the increase was due to some other issue

As explained above, MERC believes the complaint reporting is now more accurate than in the past and it would be difficult to compare with previous years.

E. A copy of MERC's May 1, 2012 customer complaint report required by Minnesota Rule 7820.0500

A copy of MERC's May 1, 2012 customer complaint report is attached (Attachment A).

F. Explanation of each unusual service interruption, as defined in the Department's comments on the Company's 2011 Service Quality Report; including, what caused the service interruption and why the event impacted several customers or lasted for an extended period of time

Attachment B to these reply comments provides additional information regarding the twelve "unusual service interruptions" identified, including what caused the service interruption (where known), and why the event impacted several customers or lasted for an extended period of time.

G. Further information regarding the residential explosion that occurred on September 15, 2012 and updates on the status and findings of the investigation

The investigation of the incident of September 15, 2012 at 213 Elm Street, Tracy, MN is not complete. Post-incident inspections and testing show that there were no natural gas leaks from jurisdictional piping or equipment.

H. Why monthly O&M expenses in October 2012 were noticeably different than the monthly average

In September 2012, MERC booked the performance incentive payout to its third party billing and call center vendor, Vertex. This resulted in an accrual being booked in October which overstated the October O&M. There was a reversal done in November which resulted in that month's O&M being less than other months. When averaging October and November you will note the amounts are similar to the other months.

DATED this 8th day of July, 2013.

Respectfully submitted,
DORSEY & WHITNEY LLP

/s/ Michael J. Ahern
Michael J. Ahern
50 South Sixth Street
Minneapolis, MN 55402
(612) 340-2881

Attorney for Minnesota Energy Resources Corporation

Attachment A

Attachment A

Minnesota Public Utilities Commission

Consumer Affairs Office
121 7th Place East #350
St. Paul, MN 55101-2147

ANNUAL SUMMARY OF CUSTOMER COMPLAINTS
For Year End 2012 Due May 1st Docket 377
In accordance with MINN. Reg. PSC 284

Name of Utility: Minnesota Energy Resources
Address: 2665 145TH STREET WEST, ROSEMOUNT, MN
Prepared By: Nancy Lilienthal Phone: 651-322-8902

* *

	Residential			Commercial/Industrial			Interruptible		
	Number Received	*Number Resolved*	*Number Unresolved*	*Number Received*	*Number Resolved*	*Number Unresolved*	*Number Received*	*Number Resolved*	*Number Unresolved*
I. Complaint Type									
A. Service	1040	1040		51	51				
B. Billing	199	199		20	20				
C. Rates	280	280		21	21				
D. Rules	224	224		29	29				
TOTAL COMPLAINTS	1743	1743	0	121	121	0	0	0	0

* *

	Residential	**Commercial/ Industrial**	**Interruptible**
II. A. Number of Disconnections for Nonpayment	7,029	377	0
B. Number of Escrow Forms Filed (per PSC Rule 302G)	0	0	0
III. A. Total Number of Customers (year end)	191,448	21,331	461
B. Number of Customer's Added During Year	965	-29	-47

NUMBER OF DISCONNECTS
FOR NON-PAYMENT
(By Month)

	1	2	3
JAN	73	17	
FEB	181	15	
MAR	383	44	
APR	632	78	
MAY	1688	70	
JUNE	1536	71	
JULY	1477	30	
AUG	594	18	
SEPT	270	7	
OCT	169	16	
NOV	13	3	
DEC	13	8	
TOTAL	7,029	377	0

1. Residential
2 Commercial/Industrial
3. Interruptible

Attachment B

Attachment B—Unusual Service Interruptions

Date	Address	Cause (System issue, MERC employee/contractor, or other)	Number of customers affected	Outage Duration	Cause of unusual service interruption; explanation of length and number of customers affected
1/7/2012	120 N Dugan Welcome	Other	1	1200	An individual hit a meter set with his car, causing damage and a leak. The service interruption occurred on a Saturday night. The business affected was closed over the weekend and a crew repaired it the next business day.
4/30/2012	310 Brown St Jackson	Other	1	1311	A third party-contractor was using a boring machine, pulling back pipe. Contactor did not verify the depth of the boring machine reamer and struck the underside of a service line, forcing the pipe upward and breaking the pipe at the threaded connection. The service interruption occurred at approximately 9pm. The area was made safe and a repair crew repaired the following day.
4/30/2012	50940 Miller Highway Hermantown	Other	100	540	On April 30, 2012 a contractor working on a sewer project hit a service tee on a 2 inch PE main breaking the service tee off the main and allowing gas to blow. The main was squeezed off upstream of the damage, resulting in an interruption of natural gas service to one hundred customers. After repairs were completed the main was placed back in-service and service restored to the impacted customers.
7/2/2012	111 Benjamin Jackson	Other	3	1140	An unknown service line was hit during third party contractor boring. The service line was not on maps and the meter inside the home had not been in service for years. The service interruption occurred at

					approximately 4pm. The area was evacuated and made safe by 9pm and a repair crew restored service the following morning.
7/9/2012	418 Weaver St Welcome	Other	9	1020	A contractor was installing sewer and water north of a gas main and service tee. As the contractor was completing work for the day, he smelled gas and notified the fire department and MERC. It was discovered there was a leak from the service tee. The service interruption occurred around 7 pm. A construction crew made the area safe and completed repairs to the tee and services the next day.
7/12/2012	1156 River Rd Windom	Other	1	1200	A service line was pulled out because it was not supported during installation of a water line. The service interruption occurred at approximately 4pm. The area was made safe and repairs were made the next day.
7/24/2012	1208 River Rd Windom	Other	2	1020	A service line was pulled while a new water main was being installed. The root cause was determined to be a failure to hand dig while excavating the area. The service interruption occurred at approximately 4pm. The area was made safe and repairs were made the next day.
8/8/2012	1408 Pahama Ct Rochester	Other	14	240	Contractor severed dead end main resulting in service being lost to 14 customers.
8/24/2012	Golf Course and Horseshoe Rd Cloquet	Other	74	245	On August 21, 2012 a contractor working on a road rebuild project hit a 2 inch PE main. In order to safely repair the damage, the main was squeezed off. Seventy-four customers downstream of the squeeze

					point were impacted by a natural gas service interruption. Service to impacted customers was restored after repairs were completed on the damaged main.
9/8/2012	218 N Chatfield St Dover	Other	267	390	Contractor severed main feed serving Dover, requiring turning gas off to the town. The contractor was determined to be at fault.
9/14/2012	2nd St & 9th Ave Rochester	Other	19	45	Contractor severed dead end main resulting in service being lost to 19 customers.
9/27/2012	908 Milwaukee Lakefield	Other	1	1080	Operator for GM Contracting pulled the service line from the main while digging in sewer lines. Service interruption occurred at approximately 3pm. Temporary repairs were made on September 27 and service line and main repair was completed on September 28.

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Kristin M. Stastny hereby certifies that on the 8th day of July, 2013, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of these Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

/s/ Kristin M. Stastny
Kristin M. Stastny

Subscribed and sworn to before me
This 8th Day of July, 2013.

/s/ Alice Jaworski
Notary Public, State of Minnesota

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_13-355_M-13-355
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-355_M-13-355
Michael	Bradley	bradleym@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_13-355_M-13-355
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Daryll	Fuentes	N/A	USG	550 W. Adams Street Chicago, IL 60661	Paper Service	No	OFF_SL_13-355_M-13-355
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-355_M-13-355
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Electronic Service	No	OFF_SL_13-355_M-13-355
Amber	Lee	lee.amber@dorsey.com	Briggs and Morgan	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-355_M-13-355
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-355_M-13-355
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-355_M-13-355

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Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-355_M-13-355
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_13-355_M-13-355
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW Rochester, MN 55901	Electronic Service	No	OFF_SL_13-355_M-13-355

ATTACHMENT D

Filed as separate Excel spreadsheet

CERTIFICATE OF SERVICE

I, Lauren E. Pockl, herby certify that on the 8th of May, 2020, on behalf of Minnesota Energy Resources Corporation, I electronically filed a true and correct copy of the enclosed Annual Decoupling Evaluation Report on www.edockets.state.mn.us. Said document was also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 8th of May, 2020.

/s/ Lauren E. Pockl
Lauren E. Pockl

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_20-332_M-20-332
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-332_M-20-332
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-332_M-20-332
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_20-332_M-20-332
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_20-332_M-20-332
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-332_M-20-332
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-332_M-20-332
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-332_M-20-332
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-332_M-20-332
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-332_M-20-332

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-332_M-20-332
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	No	OFF_SL_20-332_M-20-332
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-332_M-20-332
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-332_M-20-332
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-332_M-20-332